



# Operationalizing Counter/Anti- Corruption Study

28 February 2014

Joint and Coalition Operational Analysis (JCOA)  
A division of the Joint Staff J-7

Report Documentation Page			Form Approved OMB No. 0704-0188	
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.				
1. REPORT DATE <b>28 FEB 2014</b>	2. REPORT TYPE		3. DATES COVERED <b>00-00-2014 to 00-00-2014</b>	
4. TITLE AND SUBTITLE <b>Operationalizing Counter/Anti-Corruption Study</b>			5a. CONTRACT NUMBER	
			5b. GRANT NUMBER	
			5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)			5d. PROJECT NUMBER	
			5e. TASK NUMBER	
			5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) <b>Joint and Coalition Operational Analysis (JCOA),116 Lake View Parkway,Suffolk,VA,23435-2697</b>			8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)			10. SPONSOR/MONITOR'S ACRONYM(S)	
			11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT <b>Approved for public release; distribution unlimited</b>				
13. SUPPLEMENTARY NOTES				
14. ABSTRACT <b>The Operationalizing Counter/Anti-Corruption study was initiated by General Dunford Commander, US Forces ? Afghanistan, through General Austin, Commander, US Central Command, in March 2013. General Dunford requested JCOA ?conduct a study examining counter/anti-corruption (CAC) operational challenges and provide recommendations to inform planning, operations, and decision-making for the final stages of Operation ENDURING FREEDOM, the follow-on mission, and to capture best practices for future doctrine.? JCOA partnered with the Joint Center for International Security Force Assistance (JCISFA) to complete the study; together, the JCOA/JCISFA team conducted 66 interviews and reviewed more than 500 documents pertaining to corruption in Afghanistan. The study team?s findings and recommendations are reported in this volume.</b>				
15. SUBJECT TERMS				
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT <b>Same as Report (SAR)</b>	18. NUMBER OF PAGES <b>65</b>
a. REPORT <b>unclassified</b>	b. ABSTRACT <b>unclassified</b>	c. THIS PAGE <b>unclassified</b>		

## Joint and Coalition Operational Analysis (JCOA)

**Mission:** In support of the Chairman's Joint Lessons Learned Program, and as directed, the Joint Staff J-7 JCOA Division collects, aggregates, analyzes, and disseminates joint lessons learned and best practices across the range of military operations in order to enhance joint capabilities.



---

### Address

Joint and Coalition Operational Analysis  
116 Lake View Parkway  
Suffolk, Virginia 23435-2697

### Requests for Information

Please send requests for information to the email addresses listed below. We will respond to your request as soon as possible. Please indicate the type of information you require and the context of how the information will be used. If there is an urgent time requirement, please include that information as well.

#### NIPRNET

██████████ • <https://intelshare.intelink.gov/sites/jcoa> • <https://community.apan.org/jcoa>

#### SIPRNET

██████████ • <http://intelshare.intelink.sgov.gov/sites/jcoa>

#### BICES

██████████ • <http://jcoa.act.nato.int/portal>

## Table of Contents

Operationalizing Counter/Anti-Corruption Study Abstract.....	v
Introduction .....	1
Study Findings .....	8
1. An Operating Environment that Fostered Corruption.....	9
2. Preconditions for Combating Corruption .....	13
3. Improved Understanding, but Issues Remained .....	22
Future Considerations.....	35
Fitting CAC to COIN – A Framework.....	35
Recommendations for Operationalizing CAC .....	39
Prepare: Guidance and Capability .....	39
Plan, Organize, and Operate .....	41
Appendix A: Study Request Memorandum .....	43
Appendix B: DOTMLPF-P Recommendations .....	45
Appendix C: JCISFA Report Summary .....	49
Appendix D: Abbreviations .....	57

**UNCLASSIFIED**

INTENTIONALLY BLANK

**UNCLASSIFIED**

## Operationalizing Counter/Anti-Corruption Study Abstract

The Operationalizing Counter/Anti-Corruption study was initiated by General Dunford, Commander, US Forces – Afghanistan, through General Austin, Commander, US Central Command, in March 2013. General Dunford requested JCOA “conduct a study examining counter/anti-corruption (CAC) operational challenges and provide recommendations to inform planning, operations, and decision-making for the final stages of Operation ENDURING FREEDOM, the follow-on mission, and to capture best practices for future doctrine.” JCOA partnered with the Joint Center for International Security Force Assistance (JCISFA) to complete the study; together, the JCOA/JCISFA team conducted 66 interviews and reviewed more than 500 documents pertaining to corruption in Afghanistan. The study team’s findings and recommendations are reported in this volume.



**UNCLASSIFIED**

INTENTIONALLY BLANK

**UNCLASSIFIED**

# Operationalizing Counter/Anti-Corruption Study

## Introduction

Corruption directly threatens the viability and legitimacy of the Afghan state. Corruption alienates key elements of the population, discredits the government and security forces, undermines international support, subverts state functions and rule of law, robs the state of revenue, and creates barriers to economic growth.<sup>1</sup> In 2013, the outgoing commander of the International Security Assistance Force (ISAF), General Allen, briefed President Obama that “corruption is the existential, strategic threat to Afghanistan.”<sup>2</sup> In March 2013, General Dunford, the ISAF and US Forces – Afghanistan (USFOR-A) commander, requested JCOA “conduct a study examining counter/anti-corruption (CAC) operational challenges and provide recommendations to inform planning, operations, and decision-making for the final stages of Operation ENDURING FREEDOM (OEF), the follow-on mission, and to capture best practices for future doctrine.”<sup>3</sup> In partnership with the study sponsor, Combined Joint Interagency Task Force – Afghanistan (CJIATF-A), JCOA developed a study plan to respond to General Dunford’s request. The study aimed to address corruption challenges with emphasis on the follow-on RESOLUTE SUPPORT mission, and to document lessons and best practices for inclusion in future joint doctrine, training, and professional military education (PME). JCOA partnered with the Joint Center for International Security Force Assistance (JCISFA) to conduct the study.

JCOA determined three main findings from its study of CAC activities in Afghanistan:

- The US’ initial support of warlords, reliance on logistics contracting, and the deluge of military and aid spending which overwhelmed the absorptive capacity of the Government of the Islamic Republic of Afghanistan (GIROA) created an environment that fostered corruption and impeded later CAC efforts.
- The necessary preconditions for combating corruption did not exist due to delayed understanding of the nature of Afghan corruption, decreasing levels of physical security, lack of political will on the part of both the international community and GIROA, and lack of effective popular pressure against corruption. This resulted in a large-scale culture of impunity that frustrated CAC efforts.
- Commander, International Security Assistance Force (COMISAF) guidance, in concert with the efforts of key CAC-related task forces (TFs), improved understanding of the corruption issues and supported intelligence-driven CAC planning and operations. However, lack of unity of effort reduced the effectiveness of CAC operations,

---

<sup>1</sup> CJIATF – Shafafiyat 101 briefing, 16 November 2011.

<sup>2</sup> General John Allen, USMC (Ret), former Commander, International Security Assistance Force (COMISAF), JCOA Interview, 1 July 2013.

<sup>3</sup> US Forces – Afghanistan (USFOR-A) Study Request Memorandum, 23 March 2013, Appendix A of this report.



and the persistent lack of political will on the part of GIRoA rendered almost all counter-corruption efforts moot.

## ***Methodology***

JCOA developed study questions and initial hypotheses that would lead to recommendations for COMISAF and best practices for inclusion in joint doctrine, training, and PME. Traditionally, JCOA would deploy a study team to Afghanistan to collect data and conduct interviews on-site; however, due to seasonal force protection concerns in Afghanistan at the time of the study request, JCOA did not send a team to theater for the CAC study.<sup>4</sup> Rather, JCOA's in-country liaison officer (LNO) conducted face-to-face and secure video teleconference (SVTC) interviews with key CAC personnel throughout Afghanistan. The JCOA/JCISFA study team complemented this collection by interviewing key individuals who had recently redeployed from Afghanistan, tailoring these interviews to the individual's background and experiences in theater. The team conducted 66 such interviews, including 11 interviews with flag or general officers.

Additionally, JCOA team members reviewed over 500 documents prepared by the Special Inspector General for Afghanistan Reconstruction (SIGAR), the Government Accountability Office (GAO), Department of Defense (DOD), Department of State (DOS), GIRoA, and nongovernmental organizations (NGOs), as well as scholarly works on reconstruction and corruption. JCOA leveraged prior work on corruption done by the Center for Army Lessons Learned (CALL) and North Atlantic Treaty Organization's (NATO) Joint Analysis and Lessons Learned Centre (JALLC).

Over time, JCOA refined its initial study hypotheses as a result of the team's interviews and research. The refined hypotheses provided the basis for a set of initial impressions that JCOA presented to both MG Kadavy (CJIATF-A commander) and MG McMaster (former CJIATF – Shafafiyat commander) for comment. Both generals agreed that the initial impressions were valid; these impressions then formed the foundation of the study's key findings and recommendations included in this report and Appendix B.

As noted above, JCOA partnered with JCISFA to conduct the CAC study. JCISFA focused its research on the impact of corruption on the development and sustainment of the Afghan National Security Forces (ANSF), as well as security force assistance (SFA) advisory efforts. A summary of JCISFA's key findings and recommendations is provided in Appendix C.<sup>5</sup>

---

<sup>4</sup> Seasonal force protection concerns included the spring/summer fighting season and Ramadan.

<sup>5</sup> The full JCISFA report will be published by JCISFA at a later date.

## ***Concepts and Definitions***

### **Defining Corruption in Afghanistan**

One of the initial challenges US and coalition forces faced as they grappled with corruption was how to effectively define it. Transparency International (TI), a well-regarded NGO focused on advancing accountability and integrity in governance, defined corruption as “the abuse of entrusted power for private gain.”<sup>6</sup> The World Bank used a more restrictive definition, “the abuse of public office for private gain.”<sup>7</sup> These definitions, however, proved problematic for defining corruption in Afghanistan; in particular, the words “abuse” and “private” were often not appropriate.

For example, low-ranking Afghan civil servants typically charged a user fee or gratuity as a means of supplementing low wages—and up to a third of Afghans considered it acceptable for government employees to request this gratuity, or *baksheesh*.<sup>8</sup> In the eyes of many Afghans, a gratuity did not constitute “abuse,” even if it would to the international community. In addition, the beneficiaries of corruption were often not “private” individuals, but members of ethnic and/or tribal patronage networks who looked upon these payments as providing traditional means for survival.<sup>9</sup>

Eventually, ISAF came to define corruption as “the misuse of positions of power for personal gain.” However, the delay in defining corruption in the proper context for the operating environment contributed to the initial difficulties commanders and their staffs had in understanding the impact of corruption on their operations and the ISAF mission. Even with the above definition, ISAF was challenged with operationalizing corruption efforts because the preconditions had not been met.

### **Defining Corruption Lines of Effort**

ISAF developed two complementary lines of effort to combat corruption: anti-corruption and counter-corruption. Anti-corruption measures were those aimed at limiting the opportunities for corruption. They included transparency and accountability control measures, inspections, audits, and actions to influence individual behavior. Anti-corruption measures inconvenienced corrupt actors but did not sanction them for their actions, which possibly helped further a culture of impunity in Afghanistan. Counter-corruption measures were corrective in nature, focused on sanctioning corrupt individuals and providing a deterrent against corruption. Counter-corruption measures were strongly reliant upon an effective legal system, particularly an independent judiciary. Without this, coalition counter-corruption actions were usually a step behind the corrupt actors.

---

<sup>6</sup> Transparency International website, accessed 8 November 2013, [www.transparency.org](http://www.transparency.org).

<sup>7</sup> World Bank website, accessed 8 November 2013, [www.worldbank.org](http://www.worldbank.org).

<sup>8</sup> “Foghorn Wave 16 Survey Report,” ISAF, October 2013, page 18.

<sup>9</sup> Major General Ricky Waddell, USA, former CJATF – Shafafiyat commander, JCOA Interview, 30 September 2013.

## ***From 9/11 to Today***

### **A Changing Strategy**

US operations in Afghanistan commenced in October 2001 after the Taliban government refused to turn over Al Qaeda (AQ) leaders implicated in the 9/11 attacks on the US. Unconventional warfare predominated in the early phase of the conflict, with US and coalition special operations forces (SOF) working with the anti-Taliban forces in Afghanistan to drive AQ and the Taliban from the population centers. Conventional forces were small in number and primarily secured airfields.

The US supported the establishment of GIRoA in late 2002 and continued to employ both SOF and conventional forces to conduct counterterrorism (CT) operations. Although a Taliban insurgency began to gain strength, the US mission in Iraq diverted attention and resources from Afghanistan until 2009. As US forces began exiting Iraq, the focus shifted back to Afghanistan.

General McChrystal assumed command of ISAF in June 2009 and directed a shift in operations from CT to counterinsurgency (COIN). He described two principal threats to the success of ISAF's mission: the Taliban insurgency and the "crisis of popular confidence that springs from the weakness of GIRoA institutions, the unpunished abuse of power by corrupt officials and power-brokers, a widespread sense of political disenfranchisement, and a longstanding lack of economic opportunity."<sup>10</sup> Based on this assessment, ISAF elevated the priority of CAC operations in late 2009.

### **Key Organizations for Combating Corruption in Afghanistan**

ISAF, USFOR-A, US Central Command (CENTCOM), GIRoA, and others established CAC organizations that complemented existing task forces with similar mandates:

- CJIAF – Nexus: Established in 2009, CJIAF – Nexus provided actionable intelligence and information that enabled operations focused on interdicting and disrupting the networks that posed a threat to the stability and viability of GIRoA. In doing so, CJIAF – Nexus provided analysis that permitted mutually-reinforcing military, law enforcement, and influence efforts, with the aim of reducing narcotics production and corruption to the point where they no longer threatened the viability of the Afghan state or the success of the ISAF mission.
- TF-2010: Formed in July 2010, TF-2010 influenced US contracting-related actions through vendor vetting and targeted effects against nefarious entities operating in Afghanistan. TF-2010 undertook activities to deny the flow of US money to the insurgency, prevent access to installations, and ultimately enhance force protection.

---

<sup>10</sup> COMISAF Commander's Initial Assessment, 30 August 2009, Page 2-5.

- CJIAF – Shafafiyat: Established by COMISAF in August 2010, CJIAF – Shafafiyat’s mission was to support GIRoA in the development of the security ministries, Ministry of Defense (MOD) and Ministry of Interior (MOI), as legitimate and credible government institutions, and to set the conditions for self-regulating oversight of ANSF security institutions no later than 31 December 2014.<sup>11</sup>
- CJIAF-A: Established in 2012, CJIAF-A synchronized and focused counter-corruption, counternarcotics, counter-threat finance, and counter-“contracting with the enemy” activities in order to deny resources to malign actors and enhance transparency and accountability within GIRoA.

Coordinating Organizations:

- Interagency Operations Coordination Center (IOCC): Funded by CENTCOM’s counternarcotics budget, the US Drug Enforcement Administration (DEA), and the UK National Crime Agency (NCA),<sup>12</sup> the IOCC contributed to the unity of effort by maintaining and fusing a pan-Afghan counternarcotics assessment that supported the international organized crime picture. The IOCC coordinated law enforcement and threat finance efforts to identify, disrupt, and dismantle major drug trafficking organizations (DTOs).
- Afghan Threat Finance Cell (ATFC): Established in 2008, the ATFC was a US Department of the Treasury organization that identified and disrupted Taliban, AQ, and other terrorist and insurgent financial/materiel support networks in Afghanistan by subjecting these groups to the full spectrum of government tools and authorities, including diplomatic, law enforcement, military, and targeted financial actions and measures.

GIRoA established a CAC-specific organization:

- High Office of Oversight and Anti-Corruption (HOOAC): Established by Afghan Presidential decree in July 2008, the HOOAC was the highest office for the coordination and monitoring of the implementation of the Anti-Corruption Strategy and for the implementation of administrative procedural reforms in Afghanistan.

In addition to these government organizations and task forces, the following independent committees and NGOs focused on corruption in Afghanistan:

- Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC): Established in March 2010 by Afghan Presidential Decree 61, the MEC independently

---

<sup>11</sup> CJIAF – Shafafiyat was initially tasked with integrating counter-corruption activities of CJIAF – Nexus, TF-2010 and TF-Spotlight. CJIAF – Shafafiyat mission changed with the standup of CJIAF-A allowing it to focus on counter-corruption activities within MOD and MOI.

<sup>12</sup> Originally, Serious Organized Crime Agency (SOCA), disbanded on 22 October 2013.

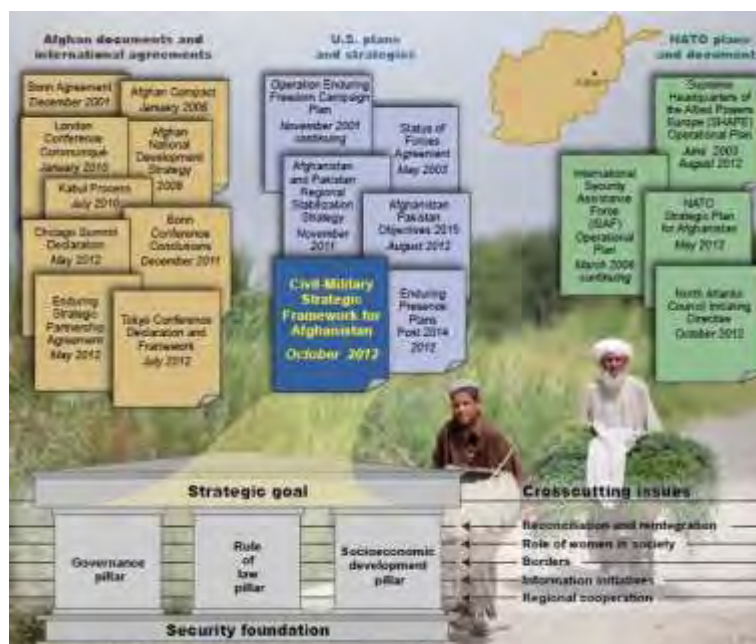
monitored and evaluated national and international efforts to fight corruption in Afghanistan. It reported to the Afghan public, Parliament, President, and the international community.

- Integrity Watch Afghanistan (IWA): Created in October 2005 and established as an independent civil society organization in 2006, the IWA mission put the spotlight on corruption by “increasing transparency, integrity, and accountability in Afghanistan through the provision of policy-oriented research, development of training tools, and facilitation of policy dialogue.”<sup>13</sup>

Additionally, multiple international organizations and NGOs included reporting on Afghanistan in their corruption analyses and indices. These included the UN, the World Bank, Transparency International, and the Asia Foundation.

## Strategic Framework

The US, NATO, and the broader international community have been decisively engaged in Afghanistan for the dozen years since 9/11. The GAO's Strategic Framework for US Efforts in Afghanistan (Figure 1) lists the key documents that formed the basis of US and ISAF strategies in Afghanistan. Prior to the London Conference in January 2010, corruption was an overlooked factor in planning. After the conference, corruption became more salient. The NATO Chicago Summit Declaration in May 2012 further emphasized the reduction of corruption and improvement of governance in Afghanistan. The Tokyo Conference in July 2012 issued the Tokyo Mutual Acco on the delivery of aid and required significant reforms in order to red



### Figure 1. Strategic Framework for US Efforts in Afghanistan

Government Accountability Office

This JCOA study report looks at the current state of CAC-related efforts in Afghanistan, extrapolates lessons and best practices for application in other military operations, and

<sup>13</sup> Integrity Watch Afghanistan website, accessed 8 November 2013, [www.iwaweb.org](http://www.iwaweb.org).

provides recommendations both for further action in Afghanistan and inclusion into future joint force development efforts. The three main finding areas, their supporting findings, and high-level recommendations are discussed below. A detailed doctrine, organization, training, materiel, leadership and education, personnel, facilities, and policy (DOTMLPF-P) matrix of recommendations is provided in Appendix B.

UNCLASSIFIED

INTENTIONALLY BLANK

UNCLASSIFIED

## Study Findings

### 1. An Operating Environment that Fostered Corruption

**Finding One:** The US' initial support of warlords, reliance on logistics contracting, and the deluge of military and aid spending which overwhelmed GIRoA's absorptive capacity created an environment that fostered corruption and impeded later CAC efforts.

#### 1.1 Warlords

**Supporting Finding 1.1.** *The initial US focus on defeating the Taliban and AQ created mutually dependent relationships between the US, GIRoA, and Afghan warlords that empowered these warlords, expanded their opportunities for financial gain, and impeded later CAC actions.*

Afghanistan's geography provided significant challenges during development of military plans in the aftermath of the 9/11 attacks. However, the presence of an organized resistance to the Taliban—the Northern Alliance—and the availability of US air power enabled US SOF and the Central Intelligence Agency (CIA) to wage unconventional warfare against the Taliban.<sup>14</sup>

The unconventional warfare campaign was successful in driving the Taliban and AQ out of Afghanistan, but it also served to strengthen some of the warlords within Afghanistan. Prior to this campaign, the Northern Alliance was mostly a coalition of anti-Taliban political parties based on ethnic and sectarian identity. The US need for a proxy force to press the fight against the Taliban led to employment of the only organized armed force available, the warlords that constituted the Northern Alliance. With US support and patronage (which continued after the Taliban and AQ were driven from Afghanistan), these warlords were able to operate with impunity and improve their political positions.<sup>15</sup>

President Karzai needed to reconcile the local powerbase to GIRoA and did so by placing warlords in key government positions as a way to obtain loyalty. Numerous political deals allowed Karzai to gain the interim presidency in 2004 and subsequently the presidency in 2009. The 25 GIRoA ministries also served as opportunities to dispense patronage through appointments.<sup>16</sup> As one civilian advisor noted, "We wanted our guy [Karzai] in, but our guy was not supported by everyone else. He and his family started making deals with the various warlords in order to keep themselves in power, and [they have] certainly done so."<sup>17</sup>

Once ensconced within ministries and other government posts, the warlords-cum-ministers often used their positions to divert GIRoA resources to their constituencies. Because patronage networks, endemic in a tribal society like Afghanistan, helped many people survive the previous

<sup>14</sup> Joint Publication (JP) 3-05, *Special Operations*, 18 April 2011.

<sup>15</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>16</sup> Major General Ricky Waddell, USA, former CJATF – Shafafiyat, JCOA Interview, 30 September 2013.

<sup>17</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.



decades of conflict,<sup>18</sup> the new ministers saw the scramble for power and resources as a means to enhance their standing, and diverted resources accordingly.<sup>19</sup> This diversion of resources strengthened the reach and power of extant networks, sometimes transforming them into what came to be known as “criminal patronage networks” (CPNs).

The entrenchment of CPNs in GIROA ministries impeded ISAF CAC efforts.<sup>20</sup> Due to the extent of CPNs, the removal of one corrupt official typically only resulted in another member of the network taking his place and continuing his corrupt practices. Despite this, President Karzai remained politically dependent on the CPNs; he therefore resisted COMISAF pressure to prosecute corrupt CPN members because, as one senior civilian advisor noted, “[prosecution] meant Karzai would be putting one of his allies in jail.”<sup>21</sup>

## 1.2 Contracting

**Supporting Finding 1.2.** *US dependence on contracting for logistics created opportunities for corruption and hindered later CAC efforts.*

Afghanistan’s geography and infrastructure were not conducive to supporting a large military occupation force, particularly one that traveled as heavily as the US military. Until OEF, fewer than 25 km of railway existed within Afghanistan and its only cross-border rail link was to landlocked Uzbekistan. The nearest friendly seaport of debarkation (SPOD) was in Karachi, Pakistan. Because of this, bulk shipments of supplies had to be driven by truck from Karachi to Kandahar or Kabul and then distributed to the rest of the country. The US force structure did not include sufficient long-haul transport to support this supply chain, leading to the decision to employ contract trucking. As one senior officer noted, “If we occupy a country, we need large-scale contracting. There is no way around it.”<sup>22</sup>

The primary logistics contracting method for Afghanistan was host-nation trucking (HNT). Under HNT, “responsibility for the supply chain was almost entirely outsourced to local truckers and Afghan private security providers.”<sup>23</sup> However, many of the private security companies hired by the trucking companies were of a dubious nature. As an influential US Congressional report noted,

---

<sup>18</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>19</sup> Major General Ricky Waddell, USA, former CJIAF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>20</sup> General Allen, as reported in *New York Times*, 6 February 2013, accessed 6 December 2013, <http://www.nytimes.com/2013/02/07/world/asia/general-allen-departing-afghan-war>.

<sup>21</sup> Former member of the Commission on Wartime Contracting, JCOA Interview, 4 September 2013.

<sup>22</sup> Former Commander, Defense Contract Management Agency Afghanistan, JCOA Interview, 29 May 2013.

<sup>23</sup> “Warlord, Inc.: Extortion and Corruption Along the US Supply Chain in Afghanistan,” Subcommittee on National Security and Foreign Affairs, US House of Representatives, June 2010, page 1.

“The private security companies are frequently involved in armed conflict with alleged insurgents, rival security providers, and other criminal elements....They are typically warlords, strongmen, commanders, and militia leaders who compete with the GIRoA for power and authority....The contractors have little choice but to use [the security companies] in what amounts to a vast protection racket.”<sup>24</sup>

In 2010, DOD awarded \$2.16 billion for HNT to eight companies. The same Congressional report stated,

“Several of these prime contractors did not own any trucks and subcontracted out all of their trucking needs. Many of the prime contractors have only a handful of people in Afghanistan, and at least one prime contractor had no prior experience in the trucking business. Prime contractors reported that there is a finite ‘pool’ of trucks in Afghanistan, and that many of the prime contractors compete with each other through subcontractors for the use of the same vehicles.”<sup>25</sup>

Additionally, the prime contractors exercised weak oversight of their subcontractors and had limited firsthand knowledge of convoy security arrangements. For safety reasons, most of the prime contractors’ representatives were unable or unwilling to travel on the roads and left oversight of security contracting to their subcontractors.<sup>26</sup>

This logistics arrangement directly undercut COIN and CAC efforts:

“Providing ‘protection’ services for the US supply chain empowers these warlords with money, legitimacy, and a *raison d’être* for their private armies....While outsourcing principal responsibility for the supply chain in Afghanistan to local truckers and unknown security commanders has allowed the Department of Defense to devote a greater percentage of its force structure to priority operations, these logistics arrangements have significant unintended consequences for the overall COIN strategy. By fuelling government corruption and funding parallel power structures, these logistics arrangements undercut efforts to establish popular confidence in a credible and sustainable Afghan government.”<sup>27</sup>

By the time US commanders realized the deleterious effect of this arrangement and attempted to take corrective action against the highway warlords and trucking companies, they were so well entrenched that any imposed sanctions would have significantly impeded

---

<sup>24</sup> “Warlord, Inc.: Extortion and Corruption Along the US Supply Chain in Afghanistan,” Subcommittee on National Security and Foreign Affairs, US House of Representatives, June 2010, pages 2-3.

<sup>25</sup> Ibid, page 13.

<sup>26</sup> Ibid, page 53.

<sup>27</sup> Ibid, pages 2-3.

US logistics.<sup>28</sup> USFOR-A found itself trapped in a warlord protection racket. As one former Regional Command (RC) commander noted, “We had a role in contributing to corruption, and that was because of the way we spent our money, because of the way we contracted, and because of our logistics system.”<sup>29</sup>

### 1.3 Spending

**Supporting Finding 1.3.** *The deluge of military and aid money into Afghanistan overwhelmed GIRoA’s absorptive capacity for funds and, coupled with weak oversight by ISAF and the international community, created ample opportunities for corruption.*

Afghanistan’s institutions lacked the ability to handle the large sums of money that GIRoA received directly through aid. The US SIGAR noted in testimony,

“The Afghan government does not appear to have the capacity to manage the amount of funding envisioned in the international community’s pledges of direct assistance. Funds provided through direct assistance are typically subject to less US and international donor community oversight than are funds provided through projects implemented by US and international donor community and government agencies, leaving them particularly vulnerable to fraud, waste, and abuse. This is especially risky, given the pervasiveness of corruption in Afghanistan.”<sup>30</sup>

The sheer number of contracting dollars overwhelmed the Afghan economy. A senior civilian advisor explained, “An economy can only absorb a certain amount of inputs until it becomes saturated. Additional input goes somewhere else, usually capital flight, usually illicit. In Afghanistan, absorptive capacity [was] reached in the first year of operations. That led to the corruption eruption.”<sup>31</sup> Overall, ISAF and the international community “were spending a significant amount of money and not always understanding exactly where that money was being spent.”<sup>32</sup>

DOD forces often lacked the ability to account for their spending. This was due, in part, to the large number of accounting systems and the inability to integrate them, as well as the fact that contracting regulations did not adequately address the issues that commanders faced in Afghanistan. One senior officer remarked, “The Federal Acquisition Regulation (FAR)

---

<sup>28</sup> Former Senior Advisor for the Office of Afghanistan and Pakistan Affairs for the US Agency for International Development (USAID), JCOA Interview, 29 August 2013.

<sup>29</sup> Lieutenant General Nick Carter, British Army, former DCOMISAF and RC-S commander, JCOA Interview, 26 November 2013.

<sup>30</sup> “Direct Assistance to the Afghan Government Faces Risks,” SIGAR Testimony 13 February 2013, page 5.

<sup>31</sup> Former Senior Advisor for the Office of Afghanistan and Pakistan Affairs for USAID, JCOA Interview, 29 August 2013.

<sup>32</sup> Lieutenant General Nick Carter, British Army, former DCOMISAF and RC-S commander, JCOA Interview, 26 November 2013.

is a domestic product more suitable to Peoria than Kabul.”<sup>33</sup> Further, it was difficult for contracting officers to see below the prime contractor, often because of language and cultural barriers. Few contracting officers possessed the requisite skill sets to investigate below the level of the prime contractor, and the confusing web of subcontractors and changing company names and identities added to the challenge of accurately accounting for expenditures.

A desire to demonstrate progress created a perverse incentive that eroded oversight of spending at the tactical level. One officer noted, “When [senior commanders] believed that putting cash in people’s hands was the way to win hearts and minds, they graded [lower-level] commanders on the number of [Commanders’ Emergency Response Program (CERP)] projects they could get obligated. Of course, they got a whole bunch of CERP projects; none of which were completed and most were barely under way when that commander rotated and the new commander came in. What’s [the new commander’s] incentive? To go fix all of the old CERP projects or do a bunch of his own?”<sup>34</sup> The result was the bolstering of a false economy that further strained Afghanistan’s absorptive capacity – and the expenditure of millions of dollars with almost no oversight or alignment with other USG efforts.<sup>35</sup>

After the fall of the Taliban, development and reconstruction aid to Afghanistan soared. However, the generally poor security environment made it difficult for both NGOs and government aid organizations to conduct proper oversight of the projects they undertook. SIGAR repeatedly cited the US Agency for International Development (USAID) for failing to account for its spending due to a lack of resources and the obscurity of subcontractor relationships.<sup>36</sup>

A senior US defense policy analyst noted that the international community as a whole “poured money into Afghanistan with miserable fiscal controls, little real effort to validate whether such spending levels were necessary, an almost total lack of transparency, and no meaningful measures to their effectiveness or the level of corruption and waste in such spending.”<sup>37</sup> As one former RC commander described, “We never really understood the problem....We were naïve to the affair.”<sup>38</sup>

## 2. Preconditions for Combating Corruption

**Finding Two: The necessary preconditions for combating corruption did not exist due to delayed understanding of the nature of Afghan corruption, decreasing levels of physical security, lack of political will on the part of both the international community and GIRoA,**

<sup>33</sup> Major General Richard Longo, USA, former CJATF-A commander, JCOA Interview, 2 October 2013.

<sup>34</sup> Former member of the Commission on Wartime Contracting, JCOA Interview, 4 September 2013.

<sup>35</sup> Andrew J. McNulty, “A Return to Instability,” *Marine Corps Gazette*, January 2013, page 55.

<sup>36</sup> “USAID has disbursed \$9.5 billion for reconstruction and funded some financial audits as required, but many audits face significant delays, accountability limitations, and lack of resources,” SIGAR 12-09, 30 April 2012.

<sup>37</sup> Anthony H. Cordesman, “How America Corrupted Afghanistan: Time to Look in the Mirror,” Center for Strategic and International Studies, 9 September 2010, page 5.

<sup>38</sup> Lieutenant General Nick Carter, British Army, former DCOMISAF and RC-S commander, JCOA Interview, 26 November 2013.

and lack of effective popular pressure against corruption. This resulted in a large-scale culture of impunity that frustrated CAC efforts.

### ***Preconditions for Combating Corruption***

In 2007, the Stimson Center postulated three preconditions for effectively fighting corruption in war-torn states:

- Establishment of relative security
- Development of political will
- Public investment in the fight against corruption<sup>39</sup>

Partially based on the “Anti-Corruption Tool Kit” of the UN Office on Drugs and Crime (UNODC), JCOA determined an additional precondition, that of the need to understand corruption within the context of the operating environment.<sup>40</sup>

The consensus among the commanders interviewed for this study was that ISAF, GIRoA, and the international community had not fully established these four preconditions for combating corruption. The commanders agreed that anti-corruption activities could be conducted before all four preconditions were met, but counter-corruption activities could not be completely successful until each of the preconditions was satisfied.

### ***2.1. Delayed Understanding***

***Supporting Finding 2.1.*** *The coalition was slow to understand the integrated and pervasive threat corruption posed to the ISAF mission, which impeded later CAC efforts.*

This delayed understanding was due to unclear and inconsistent views of corruption in Afghan culture and politics, the difficulty of assessing the extent of corruption, and limited CAC expertise on the ISAF staff. These issues contributed to ISAF not formally addressing the corruption problem until 2009, limiting the options available to commanders to combat corruption and undermining their moral legitimacy in the eyes of the Afghan people.

ISAF personnel did not possess a clear picture of the role of corruption in Afghan institutions, and the dichotomy between Afghan and Western culture led to challenges in understanding. One State Department advisor noted, “The more exotic a culture is, the more we don’t understand the environment.”<sup>41</sup> This was a common refrain for the difficulties faced by ISAF and USFOR-A as they struggled to understand the operational environment.

---

<sup>39</sup> “Mapping and Fighting Corruption in War-Torn States,” The Henry L. Stimson Center, March 2007, Number 61, page X.

<sup>40</sup> “Anti-Corruption Toolkit,” UN Office on Drugs and Crime, November 2002, page 4.

<sup>41</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

Complicating our understanding further, ISAF personnel often held divergent views of the nature of corruption in Afghanistan. These differences ranged from idealistic views of Afghanistan as a model of probity before OEF,<sup>42</sup> to the belief that corruption was a response to the requirements for survival after decades of war,<sup>43</sup> to the thought that historically there was always a tendency to garner a ‘piece of the action.’<sup>44</sup> Regardless, the “exoticness” of Afghanistan and the widely varying views on the nature of corruption there presented challenges to shared understanding.

As discussed in the introduction, the delay in defining corruption in the proper context for the operating environment contributed to the initial difficulties commanders and their staffs had in understanding the impact of corruption on their operations and the ISAF mission.

ISAF and USFOR-A struggled with accurately assessing the impact of corruption. Corruption was inherently a difficult problem to measure as it typically involved clandestine activities.<sup>45</sup> CAC organizations frequently relied upon TI’s Corruption Perceptions Index (CPI), an aggregate of up to 17 perception surveys, in their assessments. Complete reliance on this index often led to the belief that this tool described “real” levels of corruption.<sup>46</sup> However, academics have criticized the CPI in recent years because “it embeds a powerful and misleading elite bias in popular perceptions of corruption, potentially contributing to a vicious cycle and at the same time incentivizing inappropriate policy responses.”<sup>47</sup>

In Afghanistan, the problem of measuring corruption was further exacerbated by difficulties associated with polling. Sarah Chayes noted, “It is almost impossible to conduct [polling] meaningfully in Afghanistan. Surveys are plagued by methodological flaws that corrode the value of their results. Though polling reports’ dense texts often acknowledge these flaws, the caveats are not reflected in the numbers—and it is the numbers that so many officials, experts, and journalists love to cite.”<sup>48</sup>

In addition to the difficulty of obtaining accurate data on corruption, ISAF and USFOR-A headquarters staffs lacked CAC expertise. One officer noted, “There is no existing Service capability to man, train, or equip for countering corruption,”<sup>49</sup> and a second officer affirmed, “The military is not set up to fight corruption—we don’t know how to do it.”<sup>50</sup> Predeployment

---

<sup>42</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>43</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>44</sup> Major General Richard Longo, USA, former CJATF-A commander, JCOA Interview, 2 October 2013.

<sup>45</sup> Francisco-Javier Urrea, “Assessing Corruption: An Analytical Review of Corruption measurement and its problems: Perception, Error and Utility,” May 2007, page 2.

<sup>46</sup> Ibid, page 6.

<sup>47</sup> Alex Cobham, “Corrupting Perceptions: Why Transparency International’s flagship corruption index falls short,” *Foreign Policy*, 22 July 2013.

<sup>48</sup> Sarah Chayes, “In Afghanistan, It’s Not All in the Numbers,” Carnegie Endowment website, accessed 3 December 2013, <http://carnegieendowment.org/2012/12/03/in-afghanistan-its-not-all-in-numbers/epjw>.

<sup>49</sup> Former Commander, Defense Contract Management Agency Afghanistan, JCOA Interview, 29 May 2013.

<sup>50</sup> Former Corruption Officer, RC-SW, JCOA Interview, 27 June 2013.

training and education, when available, did not prepare staff officers with the necessary tools to tackle corruption in Afghanistan.

This problem was compounded for US military forces who served as ministerial advisors, including one officer who noted,

“The direction from on high concerning corruption demonstrates a lack of prior background in fighting corruption. While people are available who have legitimate counter-corruption backgrounds from the State Department, Justice Department, [UN Development Programme (UNDP)] and UNODC, World Bank, the list goes on and on, we insist on using either military [inspectors general (IGs)] who know a lot about the military system but have never confronted corrupt practices or just anyone with a uniform and a can-do attitude. The results have played into the corrupt actors’ hands as one would expect in the case of amateurs confronted with professionals.”<sup>51</sup>

Further, staff positions within ISAF and USFOR-A were frequently reshuffled, with officers originally slated for tasks other than corruption assigned to corruption portfolios. Rotation policies created gaps in expertise, and mentoring relationships with GIROA and the ANSF were often interrupted. This was particularly injurious in a culture built on longstanding and enduring relationships. General Allen remarked that, even as late as 2012, CAC efforts “suffered by virtue of the constant rotation of people.”<sup>52</sup> These rotations had the further effect of practitioners who were unable to properly mentor their own replacements.

Continuity and consistency were important to a coherent anti-corruption strategy. One general officer noted, “Progress in CAC is [measured] over a 10+ year timeframe. You can set conditions, have the patience to emplace the right system, and, since I’m a general, I can say, hope.”<sup>53</sup> General Allen similarly stated, “Continuity is really important, and [even more so] continuity within counter-corruption because you [understand] corruption when you understand the tribal nature of the society and the networks within that society. So, if we’re [transitioning] people out every six to seven months to a year, you can get a lot of turbulence in there and then it does become 12 one-year wars.”<sup>54</sup> As described by a CJATF – Shafafiyat member, “[ISAF Joint Command (IJC)] and the RCs simply don’t have the expertise for transparency, accountability, and counter-corruption [TACC] on their staffs. Six months is too short to be able to adequately perform these jobs, especially with no predeployment training specific to TACC.”<sup>55</sup>

ISAF and USFOR-A did not begin to comprehensively address the threat posed by corruption until 2009. One DOS employee stated, prior to 2009, “There was recognition that [corruption]

---

<sup>51</sup> Military Advisory Group (MAG) advisor to the MOI IG, CSTC-A, JCOA Interview, 14 September 2013.

<sup>52</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>53</sup> Major General Richard Longo, USA, former CJATF-A commander, JCOA Interview, 2 October 2013.

<sup>54</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>55</sup> Deputy Chief of Staff, CJATF – Shafafiyat, JCOA Interview, 26 September 2013.



was a problem...[but] most leadership did not want to address the problem unless there was a solution. To acknowledge corruption was an inherent admission of a shortcoming in the execution of a program or an initiative. That is the other thing that led to a lack of candor and aggressiveness.”<sup>56</sup> General Allen conceded, “We got around to [CAC] pretty late.”<sup>57</sup>

The need to address corruption was ultimately driven not by activities within Afghanistan, but by the international media and the US Congress. MG Longo credited *Warlord, Inc.: Extortion and Corruption Along the US Supply Chain in Afghanistan*, a 2010 report issued by the US House of Representatives, for spurring action on corruption. However, the authors of *Warlord, Inc.* stated that it was Aram Roston, a journalist writing for *The Nation*, who prompted their investigative work.<sup>58</sup>

General McChrystal’s initial assessment as COMISAF acknowledged corruption as one of the two principal threats to the success of the mission in Afghanistan. Subsequently, COMISAF designated CAC as a primary line of operation in the campaign plan and codified CAC in its own annex to the plan.

The long delay in addressing corruption had the effect of limiting options available to commanders, ultimately impeding CAC efforts. Before the 2004 elections, the fledgling Afghan government was largely dependent on the US for support and legitimacy, and the US had an opportunity to exert influence. After the 2004 elections, GIRoA was increasingly able to assert its sovereignty and, over time, the US and international community found the government less receptive to suggestions on a variety of issues, including corruption.

The US’ perceived short-term presence also reduced its leverage over GIRoA.<sup>59</sup> The announcement of the end of major US combat operations in Afghanistan, coincident to the new US emphasis on corruption, initiated a “scramble for power, influence, and resources in order to survive.”<sup>60</sup> One advisor noted,

“Then, fast forward [to] 2011, the 2014 deadline is put out there. Boom, 2014, whether it’s we’re out wholesale or we significantly scale back wasn’t really clear in 2011. But what became clear to a lot of the Afghans, especially the bigwigs, was ‘I need to start moving whatever resources I can out of Afghanistan.’ So, it became an extraction type of corruption, which was ‘I am just pulling money out, it’s going to meet me in Dubai or in Canada or it’s going to reside

---

<sup>56</sup> Former Department of State (DOS) province team leader in Herat, Afghanistan, JCOA Interview, 17 September 2013.

<sup>57</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>58</sup> “Warlord, Inc.: Extortion and Corruption Along the US Supply Chain in Afghanistan,” Subcommittee on National Security and Foreign Affairs, US House of Representatives, June 2010, unnumbered introductory page.

<sup>59</sup> Former senior analyst, Center for Complex Operations, National Defense University (NDU), JCOA Interview, 27 June 2013.

<sup>60</sup> Major General Ricky Waddell, USA, former CJATF – Shafafiyat, JCOA Interview, 30 September 2013.



with my daughter who is studying in Australia at a university, and I'll see you there [post-2014].”<sup>61</sup>

The long US silence on corruption undermined US legitimacy. MG McMaster stated, “Afghans considered our silence on corruption to [signify we] condoned it.”<sup>62</sup> MG Waddell noted, “[Silence] discouraged good Afghans....It seemed like we tolerated [corruption].”<sup>63</sup> In addition, international media reports of President Karzai receiving a steady stream of cash payments from the CIA further reduced the perception of moral legitimacy enjoyed by the US vis-à-vis corruption and gave substance to charges of American hypocrisy.<sup>64</sup>

## 2.2 Security Concerns

**Supporting Finding 2.2.** *The erosion of security exacerbated corruption and created a situation whereby operational commanders were forced to prioritize efforts and resources between the need for improving security or fully addressing corruption.*

The US surged forces into Afghanistan in 2009 and 2010 in order to undo the gains the Taliban had made since 2003. Violence immediately increased to the point where 2010 was the deadliest year for foreign military troops since 2001.<sup>65</sup> Coincident with the troop buildup was an additional surge of aid money; however, the increased tempo of fighting severely impeded NGOs and others from exercising effective oversight of the projects they were funding, as these organizations required a permissive operating environment.<sup>66</sup>

The rapid growth in the size of the force exceeded the resupply capacity of Afghanistan's airfields and forced the largest portion of supplies onto the roads leading from Karachi and the former Soviet Union.<sup>67</sup> The complex and arduous logistics chain needed to sustain the increased force resulted in an increase in expenditures along a logistics network that was already under the control of warlords. A senior advisor noted, “Our demand for these supplies was driving a lot of response from the environment, [including private security firms] which were taxed by the Taliban.”<sup>68</sup> By the time the US started the surge, “Convoy protection money...was simply

---

<sup>61</sup> Former ISAF Senior Visiting Counter-Narcotics Advisor, JCOA Interview, 18 July 2013.

<sup>62</sup> Major General H.R. McMaster, USA, former CJATF – Shafafiyat commander, JCOA Interview, 1 October 2013.

<sup>63</sup> Major General Ricky Waddell, USA, former CJATF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>64</sup> As reported in multiple international media, including CNN website, accessed 5 December 2013, <http://www.cnn.com/2013/05/04/world/asia/afghanistan-cia-money>.

<sup>65</sup> United States Institute of Peace website, accessed 3 December 2013, [http://www.usip.org/sites/default/files/regions/faqs/Feb\\_2011\\_PIP\\_Afghanistan.pdf](http://www.usip.org/sites/default/files/regions/faqs/Feb_2011_PIP_Afghanistan.pdf).

<sup>66</sup> Former Agriculture-Business Development Team commander, Nangarhar Province, JCOA Interview, 15 August 2013.

<sup>67</sup> Sydney J. Freedberg, Jr., “Supplying the Surge in Afghanistan,” *National Journal*, 20 February 2010, accessed 20 November 2013, <http://www.nationaljournal.com/magazine/supplying-the-surge-in-Afghanistan-20100220>.

<sup>68</sup> Former senior advisor for the Office of Afghanistan and Pakistan Affairs for USAID, JCOA Interview, 29 August 2013.

a cost of doing business.”<sup>69</sup> While ISAF forces enjoyed tactical success against the Taliban, the very means underpinning their success were undermining the legitimacy of GIRoA, fueling corruption, and providing a financial windfall to the Taliban.<sup>70</sup>

## 2.3 Lack of Political Will

**Supporting Finding 2.3.** *GIRoA did not possess the political will required to challenge corruption due to the nature of the political settlement, the strength of patronage networks, and the international community’s willingness to donate and spend money with minimal conditions.*

As described in **Finding One**, GIRoA was built on a framework of patronage networks. Attempts to disrupt those networks, and the corruption that became part of their interaction with GIRoA, were politically unfeasible. One senior civilian noted,

“[General] Petraeus would of course go over and meet with Karzai on a regular basis and [then-BG] McMaster would go with him and they would both lean on Karzai, to say, ‘The only way this will go forward is if you start making some hard decisions.’ ...Of course, hard decisions meant Karzai would be putting one of his allies in jail, so he was pretty resistant to the pressure. I think that only happened three or four or times before the embassy basically said, ‘This is trying to accomplish, through sheer force of military will, something that will probably never happen as a result of sheer military will. He [Karzai] is not amenable to those kinds of [pressure].’”<sup>71</sup>

In fact, much of the corruption publicly discussed in 2009 concerned President Karzai’s dispensation of patronage to retain power.<sup>72</sup> The political realities affecting GIRoA, coupled with the lack of influence over the Afghan political strategy, greatly impacted the ability of the coalition to address the corruption problem in which it found itself mired. As former ISAF Deputy Commander LTG Carter stated, “Unless you own the political strategy, you cannot own the ability to be able to solve the problem on your own.”<sup>73</sup>

Compounding the problem throughout this period, the international community exercised only limited oversight of its spending due to the poor security environment. This was further exacerbated by the community members’ unwillingness to place conditions on the provision of their aid.

---

<sup>69</sup> Former senior advisor for the Office of Afghanistan and Pakistan Affairs for USAID, JCOA Interview, 29 August 2013.

<sup>70</sup> Aram Roston, “How the US Funds the Taliban,” *The Nation*, 30 November 2009, accessed 20 November 2013, <http://www.thenation.com/article/how-us-funds-taliban>.

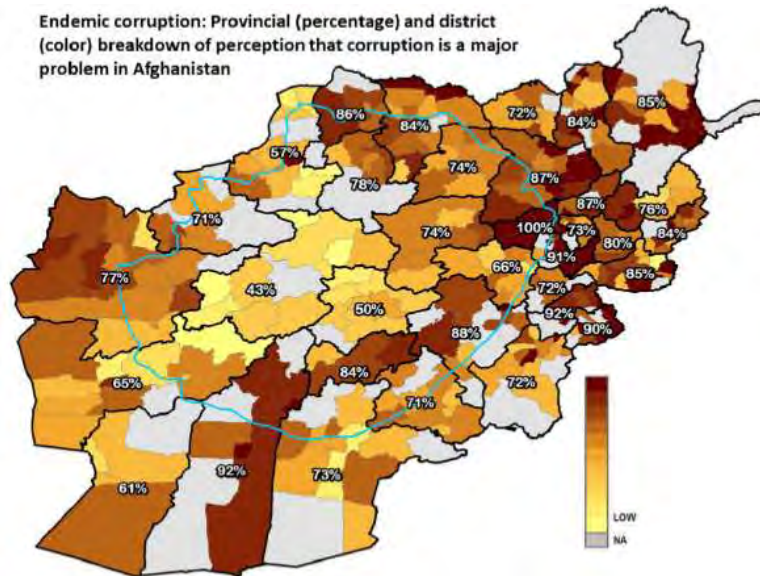
<sup>71</sup> Former member of the Commission on Wartime Contracting, JCOA Interview, 4 September 2013.

<sup>72</sup> Major General Ricky Waddell, USA, former CJIAF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>73</sup> Lieutenant General Nick Carter, British Army, former DCOMISAF and RC-South commander, JCOA Interview, 26 November 2013.

## 2.4 A People Disenfranchised and Alienated

**Supporting Finding 2.4.** *The Afghan populace often lacked the will and consistently lacked the ability to exert political pressure to combat corruption.*



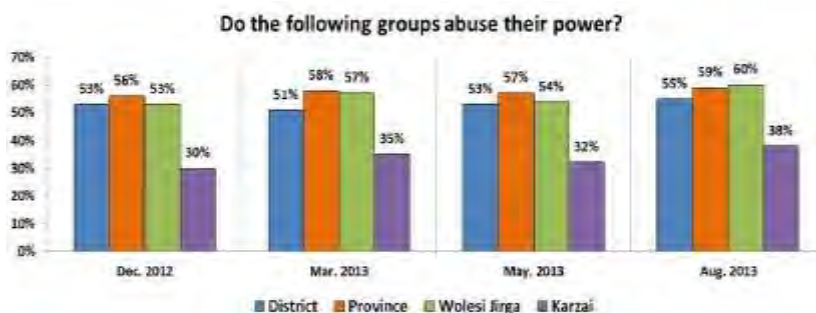
**Figure 2. Levels of Corruption by Locale, 2013**

*“Foghorn Wave 16 Survey Report,” ISAF, October 2013*

Historically, Afghanistan has always been a highly decentralized country, with Afghan distrust of institutions increasing dramatically as the institutions became less local and more national.<sup>74</sup>

Since 2003, levels of distrust and corruption have increased to the point where corruption is endemic across Afghanistan (Figure 2). In a survey of the population that was reported in October 2013, 80 percent of Afghans described corruption as a major problem, with 73

percent reporting that corruption was “a part of daily life” and 65 percent saying it was worse than the year before. Almost two-thirds (62 percent) of those polled felt GIRoA, as a whole, was corrupt to some degree. When asked why, the most common reasons cited were that GIRoA was a generally weak government and officials took bribes.<sup>75</sup>



**Figure 3. Abuse of Power by Level of Government, 2013**

*“Foghorn Wave 16 Survey Report,” ISAF, October 2013*

In the same poll, Afghans were questioned about various governance bodies and whether they abused their authority and power (Figure 3). More than half of respondents felt that every level of government and every office abused its power. Notably, President Karzai, who was viewed as corrupt by “only” 38 percent

of respondents, experienced a rise in the number of people who felt he abused his authority, to the highest level since an August 2011 poll.<sup>76</sup>

<sup>74</sup> “Foghorn Wave 16 Survey Report,” ISAF, October 2013, page 18.

<sup>75</sup> All statistics in this section are from “Foghorn Wave 16 Survey Report,” ISAF, October 2013, pages 16-18.

<sup>76</sup> Ibid.

In addition, the October 2013 poll found that 59 percent of Afghans believed Karzai's associates abused their authority and power and 60 percent thought the Wolesi Jirga was corrupt. Those persons with the historically-worst reputation for abuse were the employees of the Afghan ministries (66 percent), followed by the Ministers themselves (62 percent). Half the population believed the government was not doing enough to fight corruption or even had a functional anti-corruption strategy. While 55 percent of people believed reporting corruption was easy, 64 percent believed doing so was useless because nothing would be done. A growing number of people believed that corruption was less of a problem under the Taliban government. Finally, half of those polled believed that the international community and institutions were not doing enough to help solve this endemic issue.<sup>77</sup>

Post-2009, US commanders generally understood they had to "Afghanize the CAC strategy."<sup>78</sup> One general officer noted, "You had to engage the Afghan civil society [to work] against corruption."<sup>79</sup> However, there were issues beyond the historical distrust of central government that impeded Afghan civil society organizations from mobilizing effective political pressure on GIROA.<sup>80</sup> The Karzai government had successfully acted to remove many checks on executive power, including, as one author noted, "weakening the parliamentary opposition [by making everyone run as an independent]. A central characteristic of a liberal democratic system is the presence of effective checks and balances that, in theory, prevent one branch from obtaining too much power. By weakening potential opposition from the parliament, Karzai gave disproportionate strength to the executive branch, which made the country reliant on a small number of 'good' leaders."<sup>81</sup>

In addition, President Karzai had not implemented the provisions of GIROA's 2004 constitution allowing for the direct election of mayors and district and city councils. Instead, all local officials reported to the president. The mayor of Kandahar, a city of 491,000 people, was a presidential appointee, not answerable to local citizens.<sup>82</sup> President Karzai also appointed all governors, effectively eliminating the space between the national government and society. As one advisor noted, "The electorate cannot simply 'vote the bums out.'"<sup>83</sup> Even when Afghans had the will to oppose corruption, the system lacked viable checks and balances, which chipped away at the state's legitimacy by alienating its citizenry.

---

<sup>77</sup> All statistics in this section are from "Foghorn Wave 16 Survey Report," ISAF, October 2013, pages 16-18.

<sup>78</sup> Major General Richard Longo, USA, former CJIATF-A commander, JCOA Interview, 2 October 2013.

<sup>79</sup> Major General Ricky Waddell, USA, former CJIATF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>80</sup> Examples include Doctors Against Corruption, Teachers Against Corruption, Farmers Against Corruption and the Afghan Anti-Corruption Network, including Youth Against Corruption and Athletes Against Corruption. Brigadier General McMaster, CJIATF – Shafafiyat commander, Center for Army Lessons Learned (CALL) Interview, 27 January 2012.

<sup>81</sup> Coyne, page 167.

<sup>82</sup> Inge Fryklund, "On Drugs and Democracy," accessed 6 August 2013, <http://www.fpif.org>.

<sup>83</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

One senior advisor provided an example of the alienation that this disenfranchisement bred. In a speech given at Kabul University by a visiting professor, the professor proclaimed, “‘With this massive centralization, Afghans are not citizens, they are subjects.’ Everyone in the room cheered.”<sup>84</sup> Given that environment, it was difficult for Afghan citizens to hold their government accountable for issues such as corruption.

### 3. Improved Understanding, but Issues Remained

**Finding Three: COMISAF guidance, in concert with the efforts of key CAC-related task forces, improved understanding of the corruption issues and supported intelligence-driven CAC planning and operations. However, lack of unity of effort reduced the effectiveness of CAC operations, and the persistent lack of political will on the part of GIRoA rendered almost all counter-corruption efforts moot.**

#### 3.1 COMISAF CAC Guidance

***Supporting Finding 3.1.** COMISAF guidance in 2010 highlighted the threat of corruption and provided focused direction, including the need for flexible responses in recognition of the operational environment.*

On 10 February 2010, COMISAF issued his “Anti-Corruption Guidance,” which placed corruption in the context of the overall COIN strategy, provided commander’s intent for working with civilian partners, and outlined guidance for CAC actions.<sup>85</sup> COMISAF’s subsequent “COIN Contracting Guidance,” issued on 8 September 2010, stressed both the dangers and opportunities inherent in contracting efforts. The latter document emphasized contracting with Afghans (i.e., the “Afghan First” policy), and stressed that contracting required commanders’ leadership, establishing systems and databases to gain visibility on contractors, and integrating contracting into intelligence, plans, and operations.

#### 3.2 CJIATF – Shafafiyat

***Supporting Finding 3.2.** CJIATF – Shafafiyat improved understanding of the pervasive and interlinked nature of the corruption threats, supported an increased focus on ISAF CAC planning and operations, and improved CAC coordination within and between ISAF, GIRoA, and the international community.*

The 2010 stand-up of CJIATF – Shafafiyat improved ISAF understanding of the problem of corruption in Afghanistan, particularly its pervasive and interlinked nature. This improved understanding was an evolutionary process that built upon work done by the 2009 ISAF Anti-Corruption Task Force (ACTF), comprised of personnel from ISAF’s Deputy Chief of Staff Intelligence and Deputy Chief of Staff Stability. ACTF had made some progress in combating

---

<sup>84</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>85</sup> COMISAF “Anti-Corruption Guidance,” 10 February 2010.



corruption, but was more narrowly focused on targeting corrupt actors. ACTF faced challenges such as shortfalls in expertise, particularly in law enforcement-oriented intelligence, and the need to develop relationships with external organizations. Building upon work ACTF had done, CJIATF – Shafafiyat conducted a mapping exercise that developed the first comprehensive picture of the problem—the intersection of corruption, the narcotics trade, and the insurgency.<sup>86</sup> Then-BG McMaster, the commander of CJIATF – Shafafiyat, emphasized the importance of this task:

“Initially, we had to understand the problem. We had to not just understand it ourselves, but we had to have a common understanding across the international community and with our Afghan partners. ...We developed our understanding of the problem, mainly by talking with Afghans. We spoke with hundreds of Afghans, inside and outside of government and framed it from their perspective. ...We identified organized crime connected to politics as the main problem here. It was this connection between the criminal underworld and the political upper world that was most difficult to understand... We had to understand the organized crime networks involved in criminal activities that affected our mission and the viability of the Afghan state.”<sup>87</sup>

One senior civilian advisor noted, “The mapping exercise that [CJIATF –] Shafafiyat undertook was really an exhaustive overview of all things known about corruption in Afghanistan at that time.”<sup>88</sup>

CJIATF – Shafafiyat provided a focal point for CAC efforts. One senior officer noted,

“CJIATF-S[hafafiyat] brought in a number of external advisors and tried to determine a consolidated approach. You finally had someone in charge with resources and a plan for CAC. Prior to that, some things would [only] periodically bubble up from CJIATF – Nexus.”<sup>89</sup>

The new approach resulted in revisions to operation plans (OPLANs) and fragmentary orders (FRAGORDs) that elevated CAC to a distinct line of operation in the campaign plan. It also provided direction for flexible responses to corruption in recognition of the operational environment and tradeoffs with other campaign objectives. ISAF revised its operation order (OPORD) in 2012 to include a new annex that condensed the CAC material from previous versions and eliminated non-critical tasks.<sup>90</sup> In late 2012, General Allen further improved ISAF’s CAC focus by reorganizing key corruption-related organizations under CJIATF-A, which improved CAC unity of command. CJIATF-A took operational control of CJIATF – Shafafiyat,

---

<sup>86</sup> *SIGAR Information Paper*, CJIATF – Shafafiyat, ISAF HQ, 19 June 2011, page 2.

<sup>87</sup> Brigadier General McMaster, USA, CJIATF – Shafafiyat commander, CALL Interview, 27 January 2012.

<sup>88</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>89</sup> Former Chief of Anti-Corruption, CSTC-A, JCOA Interview, 30 July 2013.

<sup>90</sup> “CJIATF – Shafafiyat,” organizational history report, no date, pages 7-8.

TF-2010, and CJIATF – Nexus, bringing them under a single two-star commander to better coordinate their activities and ensure they had “a seat at the table.”<sup>91</sup>

CJIATF – Shafafiyat improved coordination within and between ISAF, GIRoA, and the international community. Within ISAF, the mandate of CJIATF – Shafafiyat, the reputation of its first commander for aggressiveness, and the impression the commander had the ear of COMISAF enhanced the organization’s impact. CJIATF – Shafafiyat also reached out to the international community and US government (USG) departments and agencies to improve unity of effort. One officer noted, “There were about one dozen international agencies and other national entities such as the Federal Bureau of Investigation (FBI) working CAC. CJIATF-S[hafafiyat] began to pull these various entities together.”<sup>92</sup> Despite the lack of unifying US CAC guidance, CJIATF – Shafafiyat was able to interact with elements of the USG and international community by:

- Having civilian deputy directors (FBI and DEA)
- Establishing a Counter-Corruption Interagency Effects Group (CCIEG) to discuss and take action on corruption and organized crime issues
- Participating in working groups with the US Embassy on issues such as borders and airports
- Providing staff support to the International Community Transparency and Accountability Working Group run by the UN Assistance Mission in Afghanistan (UNAMA) and the US Embassy
- Establishing ties with law enforcement activities in the US Embassy and through the Deputy US Ambassador for Rule of Law
- Coordinating with law enforcement offices through the IOCC

CJIATF – Shafafiyat also worked with GIRoA, primarily at the ministerial level, to build trust, relationships, and CAC capacity through:

- Key leader engagements
- Regular transparency and accountability updates to the President of Afghanistan
- Supporting the establishment of the Office of the National Security Council Transparency and Accountability Working Group sessions
- Working with the Afghanistan HOOAC on areas such as borders and airports, contracting corruption and organized crime, and inter-ministerial investigations of the National Military Hospital and the Office of the Surgeon General
- Supporting GIRoA establishment of the Presidential Executive Commission (PEC) on Borders, Airports, and Customs Depots
- Supporting GIRoA development of MOD CAC plans and actions
- Coordination with the US Embassy to place conditions (tied to GIRoA reforms) on the provision of aid

---

<sup>91</sup> Major General Richard Longo, USA, former CJIATF-A commander, JCOA Interview, 2 October 2013.

<sup>92</sup> Former Chief of Anti-Corruption, CSTC-A, JCOA Interview, 30 July 2013.

The primary goal of these interactions was to influence GIRoA to take ownership of the corruption problem. Then-BG McMaster noted,

“Part of exerting influence through cooperative means is really the growth of positive pressure for reform on key government leaders. Ultimately, Afghan leaders have to become convinced that it is in their interest to take on the problem of corruption and organized crime. ...This is a key element of our strategy called ‘Taqwiyat-e Shafafiyat’ which means strengthening transparency/amplifying transparency. ...We have worked with Afghan civil society groups mainly to connect them to each other. [ISAF] talking to them in a bilateral, stovepiped way isn’t going to be as powerful as connecting them to each other. The Afghans have now established a network of civil society groups including Doctors Against Corruption, Teachers Against Corruption, Farmers Against Corruption, and the Afghan Anti-Corruption Network, including Youth Against Corruption and Athletes Against Corruption.”<sup>93</sup>

### 3.3 Supporting Organizations

**Supporting Finding 3.3.** *CJIATF – Shafafiyat’s efforts at improving understanding, coordination, and counter-corruption actions were enabled by four supporting organizations. Subsequent adjustments to manning, organization, and command and control (C2) helped these organizations overcome some initial challenges to their support to ISAF and to develop the capacity of the host nation to build evidence-based law enforcement cases.*

The IOCC, CJIATF – Nexus, the ATFC, and the IJC Information Dominance Cell (IDC) all provided expertise to improve understanding of the operational environment and support various CAC actions. The key effort over time was to bring the capabilities of these organizations into a more coherent C2 structure.

The IOCC, a bilateral US DEA/UK NCA-led organization, focused on fusing a common intelligence picture and joint operations schedule in order to prioritize and coordinate law enforcement and intelligence-led, evidence-based, counternarcotics operations—a key node in the triangle of crime, insurgency, and narcotics.

The IOCC faced some initial challenges with its reliance on intelligence sources and lack of a military element sufficient to form a bridge to ISAF. This deficiency required a reorganization and new direction which ultimately made the IOCC more successful. CJIATF – Shafafiyat provided a new leader from the ISAF staff and developed a military element in the IOCC to improve its linkages to ISAF. Working within Afghan law, data from a wider variety of sources was used to maintain a comprehensive, operational-level, intelligence-driven picture to identify networks, powerbrokers, and political leaders as a key component of a holistic approach.

---

<sup>93</sup> Brigadier General McMaster, USA, CJIATF – Shafafiyat commander, CALL Interview, 27 January 2012.



One of the most significant contributions of the IOCC was providing mentoring and technical support to GIRoA, demonstrating the international community's commitment to the development of long-term, host-nation capacity in counternarcotics. The provision of support to the Afghan counternarcotics institutions yielded more prosecutorial success than in other areas, including corruption.<sup>94</sup>

CJIATF – Nexus and the ATFC provided vital intelligence information to the CAC effort. CJIATF – Nexus worked to provide actionable intelligence and information to enable operations focused on interdicting and disrupting networks that posed a threat to the stability and viability of GIRoA. ATFC was a US Department of the Treasury organization within the US Embassy that identified and disrupted terrorist and insurgent financial/materiel support networks using the full spectrum of diplomatic, law enforcement, military, and targeted financial actions and measures.

The IJC IDC, under the IJC Deputy Chief of Staff for Intelligence, brought together teams focused on security, governance, development, network effects, the human terrain, and each of the geographic regions. The IDC's intent was to provide COMIJC, the RC staffs, and other partners with an in-depth understanding of the information environment in order to enable the development of effective plans and fully-informed decisions. This organization partly addressed the need for improved understanding of the environment.<sup>95</sup>

Each of the organizations described above brought a range of USG expertise and capability to bear on particular aspects of the corruption problem. For example, the ATFC had access to the US Department of Justice, DEA, FBI, and other USG representatives. However, the C2 relationships under CJIATF – Shafafiyat initially were insufficient to leverage their combined capabilities. Along with other factors, this deficiency led to the establishment of CJIATF-A in November 2012. The CJIATF “combined the efforts of CJIATF – Shafafiyat (anti-corruption); CJIATF – Nexus (anti-nexus intelligence); the IOCC (counternarcotics); TF-2010 [contractor vetting, discussed below]; and ATFC. The establishment of CJIATF-A allowed these elements to coordinate their efforts closely, and allow[ed] ISAF to most effectively target the nexus of corruption, narcotics and insurgency.”<sup>96</sup> Of note, both CJIATF – Nexus and TF-2010 had regional nodes. These nodes, along with the IDC, reached into the RCs, providing an improved net to capture data and synthesize information into a composite picture for greater understanding.

---

<sup>94</sup> Nic Jenzen-Jones, “Chasing the Dragon, Afghanistan’s National Interdiction Unit,” 5 September 2011, accessed 06 September 2013, <http://smallwarsjournal.com/blog/chasing-the-dragon-afghanistan%E2%80%99s-national-interdiction-unit>.

<sup>95</sup> “Fixing Intel: A Blueprint for Making Intelligence Relevant in Afghanistan,” Center for New American Security, January 2010, page 5.

<sup>96</sup> “Combined Joint Interagency Task Force – Afghanistan (CJIATF-A) Semi-Annual History Report, 1 January 2013 – 30 June 2013,” undated, page 1.

### 3.4 TF-2010

**Supporting Finding 3.4.** *TF-2010 improved visibility on and oversight of prime contractors and contracting financial flows through use of intelligence and appropriate authorities. Despite these efforts, TF-2010 faced unique challenges that impeded its ability to obtain visibility on subcontractors, CERP projects, and non-DOD contracts, limiting its overall effectiveness.*

TF-2010 provided a needed business intelligence capability by conducting assessments of contracts and vendors operating in Afghanistan, while partnering with a variety of organizations to bring the necessary crosscutting expertise to the problem. The TF recommended risk mitigation strategies to commanders and contracting activities to reduce the potential for fraud and abuse. When appropriate, TF-2010 proposed actions to hold contractors accountable, up to and including debarment.

TF-2010 improved contracting visibility by consolidating multiple databases into one that provided a common operational picture (COP) of contracting firms, although a complete picture was never achieved.<sup>97</sup> One senior officer noted, “I thought the creation of TF-2010 in July 2010 and its increase in the military role in countering contract corruption was a significant improvement in applying increased scrutiny to military contracting in theater.”<sup>98</sup> Similarly, a senior DOS advisor commented, “[TF-2010] took a good hard look at contracting and made sure it did not contribute to corruption—this is Oversight 101 and makes sense.”<sup>99</sup>

TF-2010:

- Supported vetting of contractors
- Provided intelligence and information needed to pursue UN Security Council Resolution 1988 sanctions on selected targets<sup>100</sup>
- Informed decisions on actions such as suspension and debarment of selected contractors from US bases, asset forfeiture by providing evidence to allow Department of Justice action to reclaim assets, and counter-pilferage
- Identified GIRoA personnel for key leader engagements

TF-2010 supported the development of legislation to provide better conflict-zone contracting authorities. Prior to this, existing contracting laws and regulations did not provide the authority to use classified intelligence to develop cases for CAC actions. The FAR is a US domestic product and provided “zero authorities...to rescind or terminate contracts without the government

<sup>97</sup> US Department of the Treasury representative to TF-2010, JCOA interview, 29 July 2013; USAID Advisor, JCOA interview, 5 September 2013; Government Accountability Office (GAO) has also reported that the lack of a common database for development projects inhibits adequate oversight, GAO Report, “Key Oversight Issues,” GAO-13-218SP, February 2013, Section VII.

<sup>98</sup> Former TF-2010 Staff member, JCOA Interview, 9 September 2013.

<sup>99</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>100</sup> UN Security Council Resolution 1988 (2011), concerning the establishment of a new Sanctions Committee for the threats associated with the Taliban.

having to pay [a fee to the contractor].”<sup>101</sup> TF-2010 requested and supported passage of the FY-12 National Defense Authorization Act (NDAA), which included a provision of authority for the CENTCOM commander to use classified intelligence to designate a person or entity as actively supporting an insurgency or opposing US or coalition forces.<sup>102</sup> Following the CENTCOM commander’s designation, a DOD contracting activity could take action to either restrict award, terminate for default, or void contracts, grants, or cooperative agreements.

TF-2010 faced several challenges due to the large-scale use of subcontracting in Afghanistan. The TF’s success with the primary contractor database could not be replicated at the subcontractor level. TF-2010’s mandate, and the subsequent NDAA, limited TF-2010’s jurisdiction to only DOD contracting. Due to these restrictions, and because “DOS and USAID were [initially] not keen on merging their database with TF-2010’s,”<sup>103</sup> TF-2010 was unable to gain visibility on non-DOD contracting.

Additionally, the use of classified intelligence processes to determine a contractor’s suitability created legal dilemmas in Afghanistan. The first subcontractor to be debarred sued the primary contractor in an Afghan court for breach of contract. When the primary contractor asked the US contracting officer for assistance, CENTCOM was unsupportive of his request because the relevant information was classified.<sup>104</sup> This placed the USG in an awkward position and limited TF-2010’s ability to affect corruption.

### **3.5 Limited Unity of Effort**

**Supporting Finding 3.5.** *A lack of comprehensive USG guidance and authorities, competing agendas, and information sharing issues limited unity of effort within and between ISAF, USFOR-A, RCs, tactical units, the USG, the international community, and GIRoA.*

No overarching US guidance defined military and non-military CAC roles. A senior DOS advisor noted, “The problem was at the highest level. There never was any direction to ISAF, [US] Embassy, and [other government agencies] to unify efforts—actually the opposite. At high levels, the corruption fight was seen as a distraction to the relationship with Karzai.”<sup>105</sup> The US Embassy drafted a national CAC strategy in 2010, but neither the embassy nor COMISAF approved it.<sup>106</sup> This draft CAC strategy partially addressed the problem of definition of roles, but never achieved the envisioned unity of effort. General Allen asserted, “There was a [CAC] strategy. It was in the NATO strategy, and it was in the NATO operation. But the issue associated with whether the US sat down and had its own plan between the embassy and

<sup>101</sup> Senior Executive Service (SES) Douglas Packard, former Senior Contract Strategist at TF-2010, JCOA Interview, 16 September 2013.

<sup>102</sup> Public Law 112-81.

<sup>103</sup> Former TF-2010 economic analyst, JCOA Interview, 1 August 2013.

<sup>104</sup> SIGAR Audit 13-6, “Contracting with the Enemy: DOD has limited assurance that contractors with links to enemy groups are identified and their contracts terminated,” April 2013, page 2.

<sup>105</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>106</sup> SIGAR SP-13-9, September 2013, page 2.

USFOR-A, I don't recall even handling a draft."<sup>107</sup> This absence left a gap in understanding as to who was the overall in-theater lead for US CAC efforts and what the lines to coordinate CAC planning and actions were.

Without the proper authorities, even good faith cooperation was stymied. One Senior Executive Service (SES) civilian stated, "[We needed] participation across the board [and understanding] that it mattered. There was no theater-wide shared ownership of the problem....It was difficult to get people to listen and, in some cases, to even care."<sup>108</sup> As one TF-2010 member noted, "State and Defense discussed creating an Acquisition Oversight Authority for Afghanistan but there was no authority to bring all the budget authority in Afghanistan under one person or one body to have effective oversight."<sup>109</sup> Another officer stated, "It was difficult to coordinate, there was no real overall strategy, there was even no overall focus, and there were disconnects as to what our primary mission was, whether it was to deal with certain systems or bad actors. So, I would say that it was, in a word, a mess."<sup>110</sup>

Despite concerted efforts, coordination of military CAC efforts within and between ISAF, GIRoA, the USG, and the international community remained inconsistent. CJIAF – Shafafiyat attempted to improve coordination by establishing the CCIEG. There were also other in-theater efforts to develop consolidated guidance, notably the 2009 "US Embassy/USFOR-A Integrated Civilian-Military Campaign Plan for Support to Afghanistan" and the 2012 "US Civil-Military Strategic Framework" (updated in 2013). While providing a general framework for coordinating all US efforts in Afghanistan, these documents did not designate a specific lead for CAC efforts. Interviews revealed that CAC coordination was dependent upon informal ties and personal relationships. One TF-2010 member stated, "The three military task forces—2010, Shafafiyat and Nexus—coordinated their efforts via weekly VTCs during my tenure with TF-2010. Personality dynamics greatly influenced the effectiveness of these efforts and not always for the better."<sup>111</sup> MG Longo noted, "The right guy has to be picked, and he has to be empowered, not [just] to the JTF [joint task force] commander, but also in the eyes of his peers."<sup>112</sup>

The result was, according to MG Longo, "many people doing many things, sometimes with the same targeted individuals, that were not coordinated—which led to operating at cross-purposes and the most corrupt [Afghans] used us against each other."<sup>113</sup> One officer added that GIRoA and the CPNs actively exploited this lack of coordination.<sup>114</sup>

Different organizations, both within and outside ISAF, sometimes pursued goals that conflicted with overall CAC efforts. One officer noted, "Even within ISAF, there may be different objectives that each entity may have. Sometimes an organization may see battling corruption as [yet]

<sup>107</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>108</sup> SES Douglas Packard, former Senior Contract Strategist at TF-2010, JCOA Interview, 16 September 2013.

<sup>109</sup> Former TF-2010 staff member, JCOA Interview, 9 September 2013.

<sup>110</sup> Chief of Anti-Corruption, NTM-A/CSTC-A, Combat Studies Institute Interview, 10 February 2011, page 4.

<sup>111</sup> Former TF-2010 staff member, JCOA Interview, 9 September 2013.

<sup>112</sup> Major General Richard Longo, USA, former CJIAF-A commander, JCOA Interview, 2 October 2013.

<sup>113</sup> Ibid.

<sup>114</sup> Former IJC Counter Corruption Lead Analyst, JCOA Interview, 21 May 2013.

another barrier to them achieving their mission.”<sup>115</sup> One transparency and accountability officer stated, “Our own efforts have been so stovepiped as to prevent a coordinated effort. Fighting corruption has to be everyone’s job, not just one group’s.”<sup>116</sup> Personnel interviewed frequently cited the rush to train specific numbers of ANSF soldiers or spend allotted amounts of development money as organizational goals that directly conflicted with CAC operations. For example, one civilian advisor noted, “When I was with the Marines, we knew that district police chiefs were buying their positions for \$150K but there didn’t seem to be much that anyone could do about it. The Marines’ mission was training ANP [Afghan National Police]. That trumped any CAC agenda, and Afghan citizens saw this as us supporting those corrupt, higher-up officials.”<sup>117</sup>

A persistent theme regarding combating corruption was the need to balance CAC with other priorities, in particular, physical security. One RC commander noted, “There are many priorities at the tactical level, and if CAC is too much of our focus, it can actually do more harm than good—it presents a resource risk in terms of too much leadership focus and time.”<sup>118</sup> One example of this tradeoff was when ISAF requested GIRoA remove Commander Koka as the Police Chief in Musa Qala. Commander Koka was extremely corrupt, taking \$20,000 per day in opium taxes and committing mass murder. However, upon his removal, the security situation deteriorated. GIRoA reinstated Commander Koka as the police chief, and ISAF, having no further choice, embraced him.<sup>119</sup> In the end, RC-South decided that while Koka was thoroughly corrupt, he would fight the Taliban, if only to keep the money flowing. As one CJIAF – Nexus member stated, “The corruption piece is hard because security reigns supreme. We won’t remove corrupt officials if it looks like it will interrupt security, especially during this retrograde period.”<sup>120</sup>

A jaundiced view of military CAC efforts by others in the USG compounded this tradeoff. MG Waddell noted, “The rest of government saw [CJIAF – Shafafiyat as] a military takeover of the anti-corruption effort.”<sup>121</sup> The military’s size and resources were viewed as a problem, as “the military had a tendency to marginalize the civilians because it had so many resources.”<sup>122</sup> According to one civilian advisor, the military’s relative abundance of resources meant that “when they saw gaps in governance, etc., they tried to be helpful, but that led to mission creep. Trying to be helpful doesn’t mean [actually being] helpful....They [the USG] never did sort out what the military versus civilian responsibilities [for CAC] should be.”<sup>123</sup> Non-DOD

---

<sup>115</sup> Former member of CJIAF – Shafafiyat, JCOA Interview, 3 September 2013.

<sup>116</sup> Military Advisory Group (MAG) advisor to the MOI IG, CSTC-A, JCOA Interview, 14 September 2013.

<sup>117</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>118</sup> Major General William Mayville, USA, former RC-E commander, JCOA Interview, 27 September 2013.

<sup>119</sup> “Warlord, Inc.: Extortion and Corruption Along the US Supply Chain in Afghanistan,” Subcommittee on National Security and Foreign Affairs, US House of Representatives, June 2010, page 28.

<sup>120</sup> CJ2, CJIAF – Nexus, JCOA Interview, 14 August 2013.

<sup>121</sup> Major General Ricky Waddell, USA, former CJIAF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>122</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>123</sup> Ibid.

elements of the USG generally thought that TF-2010 was a good organization, doing a job for which the military was well suited. However, as one senior civilian advisor emphasized, other CJATF – Shafafiyat actions resulted in the “application of military resources against a civilian criminal problem set that resulted in a military solution to a civilian problem.”<sup>124</sup>

Despite these issues, one civilian advisor conceded, “Only DOD has the resources to manage CAC [efforts].”<sup>125</sup> However, many felt that the military did not understand the timescale involved and were looking for results much faster than could have been achieved. A senior advisor reiterated, “The military needs to resist the urge to take over a process it perceives is moving too slowly.”<sup>126</sup>

Overall, ISAF CAC efforts tended to be Kabul-centric and failed to integrate well with the RCs. General Allen stated, “It is hard to get things out of Kabul.”<sup>127</sup> Many at the RCs felt that information flowed into Kabul, but very little came out that was useful to them. One RC commander noted, “No services or capacities were being pushed out of Kabul, and what went into Kabul never seemed to come out of Kabul.”<sup>128</sup> Other ISAF subordinate HQs were affected as well. An Inspector General for Transparency, Accountability, and Oversight (IG/TAO) advisor to the MOI lamented, “We get no picture of what is going on outside of the MOI [headquarters]. We have no vision of what is happening in the provinces or from the mentors outside of MOI. We have no way to ask for the impact of our work in the field. None of their reports get to us.”<sup>129</sup>

MG Longo reflected that the establishment of CJATF – Shafafiyat and other CAC task forces suggested to the rest of ISAF that corruption was a niche task, meant to be handled exclusively by the task forces. “When a separate organization owns these things [logistics, force protection, CAC], no one else does.”<sup>130</sup> MG Kadavy suggested that “CAC-related task forces were all good and capable and could get after some things, but they should not be a substitute for the organization [ISAF, IJC, RCs] being fully engaged in working against corruption.”<sup>131</sup>

CAC coordination and information sharing were hindered by a narrow perspective on the problem of corruption and security classification issues. US national strategy stated, “Nowhere is the convergence of transnational threats more apparent than in Afghanistan and Southwest Asia.”<sup>132</sup> Yet, neither ISAF nor USFOR-A reached out to neighboring countries or other

---

<sup>124</sup> Former senior advisor for the Office of Afghanistan and Pakistan Affairs for USAID, JCOA Interview, 29 August 2013.

<sup>125</sup> Former member of the Commission on Wartime Contracting, JCOA Interview, 4 September 2013.

<sup>126</sup> Former Senior Advisor for the Office of Afghanistan and Pakistan Affairs for USAID, JCOA Interview, 29 August 2013.

<sup>127</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>128</sup> Lieutenant General Jim Huggins, USA, former RC-S commander, JCOA Interview, 27 September 2013.

<sup>129</sup> Military Advisory Group (MAG) advisor to the MOI IG, CSTC-A, JCOA Interview, 14 September 2013.

<sup>130</sup> Major General Richard Longo, USA, former CJATF-A commander, JCOA Interview, 2 October 2013.

<sup>131</sup> Major General Kadavy, CJATF-A commander, IPR comments, 28 November 2013.

<sup>132</sup> “US National Strategy to Combat Transnational Organized Crime,” July 2011.



destinations of capital flight, such as Qatar, regarding corruption until BG McMaster did with CJIATF – Shafafiyat. He noted,

“There is a transnational dimension of this and we can apply coercive means as well to these transnational networks. This involves an effort to develop a better understanding of this problem by bridging efforts between law enforcement, military intelligence, and operations. It also involves a much closer integration of law enforcement and military efforts than I think we have seen in previous conflicts.”<sup>133</sup>

Further limiting collaboration on CAC efforts, TF-2010 and CJIATF – Nexus were often unable to share the intelligence they developed with the international community or even other ISAF organizations. Foreign disclosure was a problem, with non-US coalition officers unable to access important CAC information. As one officer noted,

“CJIATF – Shafafiyat was not well integrated with the scope of CAC players initially....The interagency effects group improved the coordination but had limited participation because of the classification of materials. Government and rule of law working groups became unclassified meetings so more agencies could collaborate and it worked well....There are pros and cons to this arrangement—more people could attend so more opinions were heard and discussions were improved. Downsides are potential loss of flexibility, some don’t like us, and some have corruption problems themselves.”<sup>134</sup>

Sharing information with our Afghan partners was even more challenging. One Afghan MEC member noted, “We are good friends with CJIATF – Shafafiyat, socially the relationship is good, but formally there are challenges. The sharing of information tends to be one-sided, with only the MEC sharing data; we are not aware of what Shafafiyat’s focus is.”<sup>135</sup>

### **3.6 Lack of Political Will**

***Supporting Finding 3.6. A persistent lack of political will hindered CAC efforts.***

In contrast to the amount of effort expended by ISAF CAC organizations, GIRoA demonstrated little willingness to sanction corrupt individuals, perpetuating the perception of impunity. As one senior civilian noted,

“CJIATF – Shafafiyat engagements had no impact. General Petraeus wanted to go to the government and convince them [corruption] needed to be addressed for their own good, [but] there was no desire on the Afghan side.

---

<sup>133</sup> Brigadier General McMaster, CJIATF – Shafafiyat commander, CALL Interview, 27 January 2012.

<sup>134</sup> Former ACPAF Hands Augmentee to CJIATF – Shafafiyat, 17 January 2013.

<sup>135</sup> Former MEC member, JCOA Interview, 11 February 2013.

We needed more cooperation against malign actors and the political strategy on how to deal with them, [but] that whole conundrum was never solved.”<sup>136</sup>

The Afghan judicial system was unable to undertake significant corruption prosecutions as the system had been subverted by CPNs. As BG McMaster noted, “These networks have captured, in large measure, the judicial sector, in particular the Attorney General’s Office [AGO], the anti-corruption unit within the [AGO], and obviously areas within the ministries as well.”<sup>137</sup> One USAID advisor stated, “Overall, the biggest frustration here in country is with the AGO. It is mostly doing the exact opposite of ‘upholding the law.’ One of the main perpetrators of the corruption here is the AGO. When they do go after someone, it’s to exhort a bribe to prevent prosecution.”<sup>138</sup> Another civilian advisor further lamented, “The judiciary survived the Soviets and Taliban as a respected institution. Now, the Supreme Court is very beholden to Karzai, and the courts are widely viewed as corrupt.”<sup>139</sup> A third civilian advisor succinctly stated, “The judiciary itself is part of the malign actor set.”<sup>140</sup>

ISAF came to view the counternarcotics courts as islands of judicial integrity, and often corruption cases were “venue shopped” to them.<sup>141</sup> However, even the much-touted counternarcotics courts were often unable to close cases. One advisor noted, “Though the counternarcotics courts are propped up at US expense and for US goals, they never convict anyone important, so they are less useful than they look.”<sup>142</sup>

Moreover, GIRoA actively intervened in cases that were arguably beyond its jurisdiction. TF-2010, through CENTCOM, took action against the Afghan-owned airline Kam Air, barring it from US contracts due to opium smuggling. However, the airline was very well connected to the CPNs and, within a few weeks, the US military was forced to cease action against it.<sup>143</sup> Not only did the Karzai administration avoid sanctioning Kam Air, they successfully eliminated US sanctions on the company as well.

GIRoA further impeded CAC efforts by conducting illusory corruption reform and slow-rolling domestic reform. The Karzai administration established the HOOAC in 2008 in response to external pressure to combat corruption. The SIGAR noted the HOOAC, “which is charged with combating government corruption, has not made any significant progress, according to USAID. USAID attributed this failure to lack of will on the part of top [Afghan] leaders to engage

---

<sup>136</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>137</sup> Brigadier General McMaster, CJATF – Shafafiyat commander, CALL Interview, 27 January 2012.

<sup>138</sup> Senior Anticorruption Advisor, Office of Democracy and Governance, USAID, US Embassy Afghanistan, JCOA Interview, 29 September 2013.

<sup>139</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>140</sup> Former Rule of Law Deputy to the Ambassador, US Embassy Afghanistan, JCOA Interview, 11 September 2013.

<sup>141</sup> General John Allen, USMC (Ret), former COMISAF, JCOA Interview, 1 July 2013.

<sup>142</sup> Former Governance Advisor to II MEF in Helmand Province, JCOA Interview, 10 July 2013.

<sup>143</sup> Dan Murphy, “Afghan corruption, opium, and the strange case of Kam Air,” *Christian Science Monitor*, 5 February 2013.



seriously in the effort.”<sup>144</sup> The HOOAC was accurately described as an example of “illusory reform,” put in place to placate donors.<sup>145</sup> Additionally, the TMAF mandated the establishment of the MEC to provide independent monitoring and evaluation of anti-corruption efforts in Afghanistan. The international community appointed half its members, while President Karzai was to appoint the other half. However, Karzai tried to “slow-roll” appointments in order to handicap the MEC’s authority and influence.<sup>146</sup> As the director of Integrity Watch Afghanistan noted, “The government [of Afghanistan] may also be concerned if the MEC is well known. Any institution that becomes too independent may be perceived by the government as a threat.”<sup>147</sup>

---

<sup>144</sup> SIGAR “Quarterly Report to Congress,” 30 April 2011, page 76.

<sup>145</sup> Francisco-Javier Urrea, “Assessing Corruption: An Analytical Review of Corruption measurement and its problems: Perception, Error and Utility,” Edmund A. Walsh School of Foreign Service, Georgetown University, May 2007, page 8.

<sup>146</sup> Major General Ricky Waddell, USA, former CJATF – Shafafiyat commander, JCOA Interview, 30 September 2013.

<sup>147</sup> Director, Integrity Watch Afghanistan, JCOA Interview, 18 February 2013.

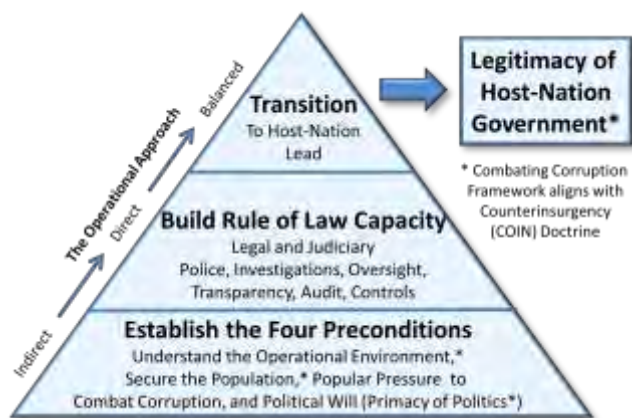
## Future Considerations

The complex challenge of conducting CAC operations in Afghanistan presages a future of similar scenarios across the full range of military operations. In order to better prepare the joint force for this challenge, JCOA developed an initial framework that nests CAC within current counterinsurgency (COIN) doctrine. This framework may also apply to other operations.

### Fitting CAC to COIN – A Framework

Combating corruption is a task that supports the primary objectives of any COIN operation, to “simultaneously protect the population,...strengthen the legitimacy and capacity of the [host-nation] government, and isolate the insurgents physically, psychologically, politically, socially, and economically.”<sup>148</sup> In Afghanistan, combating corruption rose to a level of such importance that it became a distinct line of operation within the ISAF campaign plan. As described earlier in this report, successive ISAF commanders established CAC-specific organizations to help achieve success within this line of operation.

The four preconditions of combating corruption (described in **Finding Two**) align with specific COIN tenets. First, the establishment of security supports the tenet of securing the population.<sup>149</sup> Second, the development of political will to combat corruption aligns with the tenet concerning the “primacy of politics.”<sup>150</sup> Third, the establishment of public will supports the idea of empowering the lowest levels of the population.<sup>151</sup> Finally, the need to understand the nature of the problem within the context of the environment is affirmed by the requirement to understand the operational environment.<sup>152</sup>



**Figure 4. Combating Corruption Framework**

JCOA graphic

To operationalize the task of combating corruption, one can start with an intellectual framework to visualize what should be done and the priority of these actions. The framework should be nested within current COIN doctrine, but must also be relevant for operations other than COIN. The Combating Corruption Framework (Figure 4) illustrates a hierarchy of needs to achieve success in combating corruption. To achieve success, one should work first at building the base and then move up the pyramid.

<sup>148</sup> JP 3-24, *Counterinsurgency*, 22 November 2013, page I-3.

<sup>149</sup> Ibid, page III-11.

<sup>150</sup> Ibid, page III-10.

<sup>151</sup> Although not an express tenet within the revised 2013 joint publication, empowering the population is central to creating popular pressure to address corruption.

<sup>152</sup> JP 3-24, *Counterinsurgency*, 22 November 2013, page III-7

The four key preconditions are necessary but not sufficient for transitioning the lead for combating corruption to the host-nation government. To lead, the host-nation government should have the capacity to arrest and prosecute corrupt officials. If this capacity does not fully exist, then the host nation will require support from the international community to build the necessary legal institutions to enforce the rule of law.<sup>153</sup> Once the international community and the host nation establish the four preconditions and build rule of law capacity, the host nation can take the lead in combating corruption, with the international community in support. This framework supports the COIN focus on building the legitimacy of host-nation governments.<sup>154</sup>

### **The Military's Role in Combating Corruption**

The framework shown in Figure 6 provides an approach to combating corruption, but acknowledges overall success will likely depend upon political factors often outside the influence of military forces. Although the framework implies one should move “up” the pyramid to achieve success, that may not be possible in every case. In fact, the operational environment and the time available to accomplish the mission may not support this. When the military is engaged in Phase III (Dominate) or Phase IV (Stabilize) operations, commanders may have to consciously decide where within the hierarchy of combating corruption they are operating, specifically noting if the four pre-conditions have been met. When military commanders are placed in an environment where the four pre-conditions have not been met, supporting activities which assist in establishing the four pre-conditions may be most beneficial. When commanders are engaged in operations with a host nation, they must be cognizant of where the current operational environment sits within the framework, and decide whether it is necessary for the success of the operation to attempt to move up the hierarchy or accept things as they are.

### ***Operationalizing CAC***

Experiences in Afghanistan, Iraq, and elsewhere highlighted three operational approaches to combating corruption. These approaches were:

- Indirect approach (anti-corruption)
- Direct approach (counter-corruption)
- Balanced approach

The indirect approach comprised those activities that were non-prosecutorial in nature. They were influence or capacity-building activities, including those that could mitigate corruption (e.g., improved oversight and controls). The international community and host nation used these activities to establish the four preconditions for combating corruption.

---

<sup>153</sup> “The rule of law function refers to programs conducted to ensure all individuals and institutions, public and private, and the state itself are held accountable to the law, which is supreme. Perceived inequalities in the administration of the law, and real or apparent injustices, are triggers for instability.” JP 3-07, *Stability Operations*, 29 September 2011, page xxiv

<sup>154</sup> JP 3-24, *Counterinsurgency*, 22 November 2013, page I-3.

In the early stages of combating corruption, an indirect approach was found to be the best option. In Afghanistan, this approach was referred to as “anti-corruption.”

The direct approach comprised those activities that were prosecutorial in nature. This approach included activities related to the arrest and prosecution of corrupt individuals. Once the preconditions were established, it was possible to prosecute individuals, making the direct approach an additional option. In Afghanistan, this approach was referred to as “counter-corruption.”

The combination of both the indirect and direct approaches comprised a balanced approach. Once the host nation demonstrated the capacity to lead CAC efforts and successfully convict corrupt actors, a balanced approach became the preferred option.

### ***Summary***

The operational environment and desired end state will dictate how to apply the CAC framework. To successfully combat corruption, the international community and host nation should:

1. Establish the four preconditions to a sufficient level.
2. Build the necessary rule of law capacity.
3. Transition the lead to the host nation.

GIRoA and ISAF struggled to build the base of the pyramid in Figure 6 due to corruption’s impact on the establishment of security and political will. While the Afghan public expressed its discontent with corruption, it did so in terms that suggested GIRoA was still struggling to establish its legitimacy with the populace. Although CAC tasks were incorporated into the ISAF transition planning process to enable a long-term comprehensive approach, corruption in Afghanistan was a problem that ultimately required an Afghan solution, supported by the US and the international community.

To achieve success within this CAC framework, the international community should consider the following:

1. Effective CAC efforts require a long-term commitment.
2. The host-nation’s absorptive capacity for financial/materiel aid must be carefully considered and monitored.
3. Conditions-based aid may be necessary to help develop political will.
4. The international donor community must be the example for the host nation.

Over the past several years, the international community has begun to think about long-term ways to comprehensively support CAC activities in Afghanistan. As one senior officer noted,

“As long as the politicians are not just speaking words, there’s a commitment to the ‘decade of transformation’....If you look at models like Japan, Germany,

Korea, you will notice it took a long time. There was an occupation period. There was a counterinsurgency period in Germany, Austria, and Hungary. We did not turn Germany back to the international community until 1954. It did not happen overnight. We forget that now. Those were advanced First-World industrial countries, and it did not happen immediately. So, to believe that this thing can happen quickly is flawed. But...to throw your hands up and say there is no reason to keep working when you are making progress is a mistake, too....When I look at Lisbon, Tokyo, and Chicago [conferences] and the work that is being done, it is serious work underneath.”<sup>155</sup>

Underscoring these comments is the acknowledgement that coordinated, sustained international community involvement is essential during the “decade of transformation.”<sup>156</sup>

---

<sup>155</sup> Former NATO Afghanistan Transition Task Force (NATTF) Chief of Staff, JCOA Interview, 2 January 2013.

<sup>156</sup> The “decade of transformation” is a commonly-used phrase that refers to 2015-2024 in Afghanistan. The phrase was used at the 2012 Tokyo Conference on Afghanistan, amongst others.

## Recommendations for Operationalizing CAC

The continuing struggle against corruption in Afghanistan presents lessons for the US that may be applicable to a range of future military operations. The following recommendations focus on the integration of CAC with broad military and political objectives; a detailed DOTMLPF-P matrix of recommendations is provided in Appendix B.

### Prepare: Guidance and Capability

**Review national CAC guidance.** OSD should support efforts to review national CAC guidance and develop/revise it as necessary to provide a firmer basis for establishing CAC roles, required authorities, in-country and regional planning, and the conduct and coordination of military and non-military CAC efforts.

- Review contracting authorities for sufficiency.
- Support efforts to provide a permanent capability for future contingency requirements.
- Support USG working groups to address transnational corruption and criminal threats.

**Consider development of legislation for counter-corruption,** similar to the Leahy Amendment for human rights, to more clearly define US policy on corruption and provide a forcing mechanism to link the provision of aid to CAC reforms.

**Define the military's role in CAC.** At the highest levels, department and agency leaders need to discuss CAC and its role in future contingencies in order to develop a comprehensive USG strategy that will:

- Assign lead and supporting agencies (define roles and responsibilities).
- Prioritize CAC (how to address in each phase of operations).
- Examine use of a conditions-based approach to allow the USG to evaluate partner-nation ownership of its key challenges.
- Include corruption-related vignettes in PME that emphasize the importance of USG internal coordination and cooperation, the role of the military in CAC, corruption as part of the environment, key roles and authorities of USG agencies that may be needed in contingency operations, and associated factors such as prioritization, lead agencies, and authorities.

**The Services should train their personnel to recognize and address corruption in an operational environment,** consistent with the to-be-defined military CAC role and other objectives.

- Services should improve general awareness:
  - Of the threat corruption can pose to the mission
  - That our actions have impacts on the corruption environment
  - That these impacts need to be considered in the context of other mission objectives

- Services should train their contracting personnel to conduct effective CAC actions in varying operational environments.
- Services should develop courses on combating corruption for personnel assigned to advise and assist missions.
- Services should sustain PME for CAC subject-matter experts.

**Reevaluate how existing personnel programs**, such as foreign area officer (FAO), Afghanistan/Pakistan (AFPAK) Hands, human terrain teams, civil affairs (CA), other specialists from the Reserve Component, and law enforcement support to intelligence, **help further our understanding of the operational environment related to corruption.**

- Review effectiveness of past incentives and modify as necessary to develop quality pool of specialists who can be called upon to staff organizations.
- Develop methods such as linkages to DOS Interagency Management System and other USG organizations to leverage required USG expertise and/or augment and broaden military staff expertise.

**Improve intelligence across the operational continuum** by forming multi-agency and multinational intelligence cells at the combatant command or JTF focused on understanding the nexus of corruption, narcotics, host-nation resource flows, and criminal networks.

- DOD should consider support for interagency billets within combatant commands (CCMDs) to fully support a Joint Interagency Coordination Group (JIACG)-type organization.
- Include corruption-related vignettes in joint professional military education (JPME) to highlight corruption as part of the operational environment.
- Reexamine training for intelligence personnel and their integration with law enforcement and other interagency specialties to develop an increased understanding of corruption within specific operational and cultural environments.

**Commanders and other USG leaders must have the ability to track the flow of US and international community spending** and its effects on the environment in which they are engaged.

**Commanders and other agency leaders need an enduring capability to oversee contractors** in the theater of operations.

- A scalable TF-2010-like organization should be included in doctrine as a capability to provide focused leadership, planning, and oversight for money as a weapon system in USG operations.
- TF-2010 capabilities, including its links back to CENTCOM, were identified as a best practice for vendor-vetting operations in Afghanistan. Each CCMD should consider similar capabilities and authorities in order to provide focused leadership, planning, and oversight of money in joint operations.



**Sustain and expand TF-2010 databases** to provide the capability to monitor contractors and conduct vendor vetting in future operations.

- Work with USG departments and agencies to broaden the visibility of contractors and subcontractors operating under US contracts in theaters of operation.

## **Plan, Organize, and Operate**

**Commanders should apply a CAC framework** that recognizes existing conditions and the resulting need for a pragmatic and incremental approach when operating in support of a host-nation government.

- Commanders should work to establish the four preconditions for combating corruption:
  - Understanding the operational environment specific to the culture
  - Establishing an acceptable level of security
  - Developing political will
  - Building popular will to combat corruption
- Commanders should work with others from the USG and international community to build rule of law capacity.
- Work toward transitioning the lead to the host nation, with the international community in support.

**Commanders should plan short-term operations with the expectation that they could expand in scope and duration.**

- Commanders, even while establishing security first, have to understand the operational environment and the potential for increased corruption from DOD activities.
  - Commanders should provide early CAC and contracting guidance.
- Commanders should consider and account for conditions that may foster corruption.
- Commanders should consider the potential second- and third-order effects of partnering with various host-nation leaders.

**Commanders should consider the cumulative effects of logistics spending**

on Phase IV (Stabilize) and V (Enable Civil Authority) operations.

- Commanders should begin to think about the impact spending early in the campaign may have on achieving objectives in Phase IV and V, and develop and promulgate CAC guidance accordingly.
- Joint training and exercises should include the effects of corruption as a significant factor in Phase IV and V operations, as well as in building partnership capacity (BPC) and SFA efforts.

**Enable focused CAC leadership.** A CJATF-A type organization, with integration of supporting intelligence elements such as CJATF – Nexus, the IOCC, and the ATFC, should be presented in doctrine as an organizational template.

- Commanders should overtly empower their CAC leadership, not only in the eyes of the command, but in the eyes of their peers, as well.
- Deployable CAC expertise should be included in the Joint Enabling Capabilities Command (JECC) to augment staffs of operational commanders, as needed.
- Improve CAC unity of effort between higher headquarters (HHQ) and subordinate units.
  - At each level of command, commanders need to emphasize the importance of CAC efforts, how CAC fits into their intent, and overtly empower those elements whose mission is CAC.
  - Consider placing a HHQ LNO or node in each major subordinate command to improve linkages to HHQ efforts and alleviate subordinate personnel challenges.

DOD and the international community should **monitor and assess spending to avoid surpassing the host-nation's absorptive capacity**. Additional spending may not benefit the host-nation's licit economy, and may instead fuel corruption.

- Services and agencies should stress the dangers of overspending on projects that cannot be carefully monitored or completed.
- Spending should be carefully tied to a continually-updated understanding of the local economy's ability to absorb funds.

**Improve understanding and monitoring of the operational environment.**

- Improve coordination with USG department and agency partners.
- Continue to refine and update campaign plans, applying operational design that reflects changes in the environment, accurately describes the problem, and outlines the long-term approaches for accomplishing all strategic objectives and communications.
- Key leader engagements with partner nations should include assessment and cultivation of national ownership regarding internal security challenges. BPC and SFA level of involvement should be predicated on the partner's level of ownership.
- Carefully consider classification guidance to improve information sharing while still protecting sensitive information.

**Address corruption in joint and Service training, education, and exercises.**

- Ensure personnel assigned to BPC, SFA, train, advise and assist (TAA), and CA positions have the requisite experience and training regarding human terrain and building institutional capacity of partner nations.
- DOD should provide future senior leaders with key corruption lessons in Capstone and Pinnacle training.
- Joint exercises should mandate intelligence fusion and sharing across the USG and with the international community.
- JPME and similar educational endeavors should stress the dangers—as well as the benefits—of using money as a weapon system or tool of influence.

## Appendix A: Study Request Memorandum



HEADQUARTERS  
United States Forces-Afghanistan  
Kabul, Afghanistan  
APO AE 09386

USFOR-A CDR

23 March 2013

MEMORANDUM FOR Lieutenant General George J. Flynn, J-7, The Joint Staff, Room 2B865,  
Washington, D.C. 20318-7000

THRU Commander, United States Central Command, 7115 South Boulevard, MacDill  
AFB, Florida 33621-5101

SUBJECT: Request Joint and Coalition Operational Analysis (JCOA) Study on  
"Operationalizing Counter/Anti-Corruption Efforts"

1. (U) The purpose of this memorandum is to request the JCOA Division of the Joint Staff J-7 to conduct a study examining counter/anti-corruption (CAC) operational challenges, and provide recommendations to inform planning, operations, and decision-making for the final stages of Operation ENDURING FREEDOM, the follow-on mission, and to capture best practices for future doctrine.

2. (U) One of our primary concerns as we hone our operational plan and move our transition mission forward in Afghanistan is our ability to clearly understand and navigate CAC operations. Therefore, I request the areas listed below be examined and be considered as "Emergent Needs" for this theater of operation and research/analysis to commence as soon as possible. We would like to see a deliverable product in seven months, with updates on progress being provided every four weeks, for operational use and support of our counter-corruption efforts here in Afghanistan.

3. (U) As the Primary Customer, I would like to utilize JCOA's resources and believe this study would be highly beneficial in capturing best practices and lessons on CAC from the Joint Force perspective, past operations, and from USFOR-A's anti-corruption activities. With greater strategic and operational emphasis being placed on countering corruption, and the risk corruption poses in undermining our current and future missions, this study should provide invaluable information to our imminent and future operations. I therefore request a JCOA study to examine the following:

- a. USFOR-A CAC documents, doctrine, policy, and procedures
- b. USFOR-A Command Structure involvement in CAC efforts in current and future operational theaters
- c. Joint Doctrine and lessons on CAC efforts and policy/doctrine for countering corruption
- d. Instances of corruption in recent U.S. operations, to include USFOR-A, and how these cases were apportioned and at which levels
- e. The effects of corruption on planning, operations, stabilization, reconstruction, and transition

USFOR-A CDR

SUBJECT: Request Joint and Coalition Operational Analysis (JCOA) Study on  
"Operationalizing Counter/Anti-Corruption Efforts"

- f. Possible areas of improvement for current and future operations with respect to  
"operationalizing" CAC
  - g. Policy recommendations for Department of Defense and operational-level commands  
regarding future counter/anti-corruption efforts
4. (U) In support of the JCOA collection team's effort, CJLTF-Afghanistan and CJLTF-Shafafiyat will support CONUS and OCONUS headquarters visits. The target date for completion of the final report will be on or about 31 October 2013. Release authority for the final report will remain with the Commander, USFOR-A.
5. (U) The point of contact for this memorandum is Ms. Kari Kietzer, Counter-Corruption Strategic Liaison at CJLTF-Afghanistan via DSN: [REDACTED] or e-mail: [REDACTED]



J. F. DUNFORD, JR.  
General, U.S. Marine Corps  
Commander  
International Security Assistance Force/  
United States Forces-Afghanistan

## Appendix B: DOTMLPF-P Recommendations

DOTMLPF-P Domain	Force Development Implications from CAC Findings
Doctrine	<p>Update JP 5-0 (<i>Joint Operation Planning</i>), JP 4-0 (<i>Joint Logistics</i>), and subsidiary publications to emphasize:</p> <ul style="list-style-type: none"> <li>• Understanding the operational environment includes an understanding of the potential for corruption from DOD activities</li> <li>• The need to plan short-term operations with the expectation that they may expand in scope and duration</li> <li>• Commanders must consider conditions that may foster corruption and account for these conditions in early CAC and contracting guidance</li> <li>• Commanders must account for the cumulative effect that logistics spending will have on Phase IV and V operations</li> <li>• Wartime contracting should be on par with CCMD top-level tasks and objectives</li> <li>• Commanders and other USG leaders must have the capability to track the flow of USG and international community spending and its effects on the operating environment</li> <li>• The need for improved coordination with USG department and agency partners</li> </ul>
	<p>Update JP 3-24 (<i>Counterinsurgency</i>) to emphasize that commanders must apply a CAC framework that recognizes the need for a pragmatic and incremental approach when operating in support of a host-nation government. Commanders must:</p> <ul style="list-style-type: none"> <li>• Work toward meeting the four preconditions of combating corruption: <ul style="list-style-type: none"> <li>• Understanding the operational environment specific to the culture</li> <li>• Establishing an acceptable level of security</li> <li>• Developing political will</li> <li>• Building popular will to combat corruption</li> </ul> </li> <li>• Work with members of the USG and international community to build rule of law capacity</li> <li>• Move toward transitioning the lead to the host nation, with the international community in support</li> </ul>
	<p>Update JP 4-10 (<i>Operational Contracting Support</i>) with a vignette on contracting lessons from OEF, including:</p> <ul style="list-style-type: none"> <li>• How lack of contracting oversight helped fund the Taliban insurgency and wasted US tax dollars</li> <li>• How poor oversight of large-scale logistics contracting in an underdeveloped nation like Afghanistan did damage to that nation</li> </ul>
	<p>Update JP 2-01.3 (<i>Joint Intelligence Preparation of the Operational Environment</i>), JP 3-07 (<i>Stability Operations</i>), JP 3-07.4 (<i>Joint Counterdrug Operations</i>), JP 3-08 (<i>Interorganizational Coordination During Joint Operations</i>), JP 3-24 (<i>Counterinsurgency</i>), JP 3-26 (<i>Counterterrorism</i>), and JP 3-57 (<i>Civil-Military Operations</i>) to emphasize:</p> <ul style="list-style-type: none"> <li>• The criticality of understanding the operational environment, including economic considerations, before taking action</li> <li>• Clarification of the military's role in CAC</li> <li>• Key roles and authorities that other USG agencies possess that DOD may need to rely upon in contingency operations</li> <li>• Intelligence fusion across the USG to better use departmental strengths</li> <li>• The importance of cultivating host-nation ownership as a foundation of successful efforts</li> </ul>

<b>Doctrine</b> <i>continued</i>	Update relevant Service and CCMD doctrinal publications to address the potential for corruption regarding CERP and development spending.
	Present a template for a CJATF-A type organization that includes the integration of supporting intelligence elements, such as CJATF – Nexus, the IOCC, and the ATFC.
	Provide a template for an organization similar to TF-2010 to support focused leadership, planning, and oversight of money as a weapon system in large-scale joint operations.
	Develop options to provide similar capabilities for smaller and/or enduring missions, such as SFA and BPC, including support to existing efforts within embassies.
	Emphasize that planning, including by the USG, should carefully consider the impact of the rate of dollar inflows and related second- and third-order effects within host nations.
	Codify CAC framework to guide planning and operations across the range of military operations.
	Discuss methods to improve linkages from HHQ CAC efforts to regional command/tactical unit efforts. Include the need for broadened understanding of corruption implications across the operating area, early consideration in planning, early commander guidance and intent at all levels, and embedded HHQ nodes at subordinate commands.
<b>Organization</b>	Improve intelligence across the operational continuum by forming multiagency and multinational intelligence cells at the CCMD or JTF that are focused on understanding the operational environment in the context of the nexus of corruption, narcotics, host-nation resource flows, and criminal networks.
	Include deployable CAC expertise in the Joint Enabling Capabilities Command (JECC) to augment staffs of operational commanders, as needed.
	DOD continue to support USG working groups to address transnational corruption and criminal threats.
	DOD support interagency billets within CCMDs to fully staff a JIACG-type organization.
	CCMDs develop and maintain an enduring capability to conduct contractor vetting within their areas of responsibility.
<b>Training</b>	Implement TF-2010 best practices, to include linkages with relevant CCMDs, in any future vendor vetting capability.
	Services train personnel to recognize and address corruption in an operational environment.
	Services train their contracting personnel to conduct effective CAC actions in any environment.
	Develop realistic exercises that force intelligence fusion and coordination across the USG. Training and education should emphasize the importance of interagency cooperation and coordination.
	Joint training emphasize the need to for commanders to provide early CAC and contracting guidance.
	Reexamine training for intelligence personnel and enhance their integration with law enforcement and other USG specialties to develop capacity for understanding corruption in specific operational and cultural environments.
	Joint training emphasize that planning, including by the USG, needs to carefully consider the impact of the rate of dollar inflows and related second- and third order effects within host nations.
	Add corruption as a facet of the operational environment in joint exercises and training.

<b>Materiel</b>	DOD and Services develop effective, integrated, and auditable accounting systems using standard accounting principles.
	Sustain and expand TF-2010 databases to provide the capability to monitor contractors and conduct vendor vetting in future operations.
	Develop the technical means to enable commanders to track the flow of USG and international community spending and its effects on operations.
<b>Leadership and Education</b>	JPME should include vignettes and discussions on the potential dangers of using money as a weapon system.
	Provide key corruption lessons to senior leaders in JPME, Pinnacle, and Capstone.
	Develop corruption-specific training courses for contracting officers and advisors.
	Complementary to training, include corruption-related vignettes in PME to help students think through the problem. Emphasize the importance of interagency cooperation, the role of the military in CAC, corruption as part of the operating environment, and the tradeoffs associated with prioritization, lead agencies, and authorities.
	Sustain and enhance PME for military CAC subject matter experts.
	Key leader engagements with partner nations should include assessment and cultivation of national ownership regarding the partner's internal security challenges. SFA/BPC level of involvement should be predicated on the partner's national ownership.
	Joint and Service PME include the need to be aware of the threat corruption can pose to the mission, that our actions have impacts on the corruption environment, and that these impacts need to be considered in the context of other mission objectives.
	Joint education emphasize the need for commanders to provide early CAC and contracting guidance.
	Joint and Service PME emphasize that commanders must apply a CAC framework that recognizes the need for a pragmatic and incremental approach when operating in support of a host-nation government. Commanders must: <ul style="list-style-type: none"> <li>• Work toward meeting the four preconditions of combating corruption: <ul style="list-style-type: none"> <li>• Understanding the operational environment specific to the culture</li> <li>• Establishing an acceptable level of security</li> <li>• Developing political will</li> <li>• Building popular will to combat corruption</li> </ul> </li> <li>• Work with members of the USG and international community to build rule of law capacity</li> <li>• Move toward transitioning the lead to the host nation, with the international community in support</li> </ul>
	At each level of command, commanders must emphasize the importance of CAC efforts, explain how CAC fits into their guidance and intent, and overtly empower those subordinate elements whose mission is CAC.
	Include corruption-related vignettes in PME that emphasize the importance of USG internal coordination and cooperation, the role of the military in CAC, corruption as part of the environment, key roles and authorities of USG agencies that may be needed in contingency operations, and associated factors such as prioritization, lead agencies, and authorities.
	Joint education should emphasize that planning, including by the USG, needs to carefully consider the impact of the rate of dollar inflows and the related second- and third order effects within host nations.
	Develop a JPME case study and concise briefing on corruption in Afghanistan, highlighting key considerations for planning and operations.



<b>Personnel</b>	Ensure personnel assigned to BPC, SFA, train, advise, and assist (TAA), and CA positions have the requisite CAC experience and training.
	DOD support interagency billets within CCMDs to fully staff a JIACG-type organization.
	Reevaluate existing programs and constructs related to corruption and the operating environment, including AFPAK Hands, human terrain teams, foreign area officers, civil affairs and other specialists from the Reserve Component, and law enforcement support to intelligence. Continue investments to sustain and improve capabilities.
	Review effectiveness of past incentives and modify as necessary to develop a quality pool of specialists who can be called upon to staff CAC organizations.
	Develop linkages to DOS Interagency Management System and other USG organizations to augment and broaden military staff expertise.
<b>Facilities</b>	None.
<b>Policy</b>	At the highest levels, USG department and agency leaders must discuss CAC and its role in future contingencies in order to develop a comprehensive USG strategy that will: <ul style="list-style-type: none"> <li>• Assign lead and supporting agencies (define roles and responsibilities)</li> <li>• Prioritize CAC (how to address in each phase of operations)</li> <li>• Examine use of a conditions-based approach to allow the USG to evaluate partner-nation ownership of its key challenges</li> </ul>
	Continue to develop/revise national CAC guidance, as necessary, to provide a firmer basis for CAC planning, conduct, and coordination of military and non-military CAC efforts.
	Consider developing legislation, similar to the Leahy Amendment for human rights vetting, to support conditions-based aid.
	Review legislative contracting authorities for sufficiency. Support efforts to provide permanent capabilities for future contingency requirements.
	DOD continue to support USG working groups to address transnational corruption and criminal threats.
	DOD and the international community monitor and assess spending to avoid surpassing the host nation's absorptive capacity.
	Reconsider classification guidance to improve information sharing among CAC partners, including the international community and the host nation(s).

## Appendix C: JCISFA Report Summary

### Introduction

As described above, JCOA partnered with JCISFA to conduct the CAC study requested by General Dunford in March 2013. JCISFA focused its research on the impact of corruption on the development and sustainment of the ANSF and SFA advisory efforts, conducting numerous interviews with leaders and advisors operating in key nodes across the ANSF where corruption was most likely to occur.<sup>157</sup> This appendix is a summary of JCISFA's findings and recommendations.<sup>158</sup>

SFA is defined as DOD activities "that contribute to unified action by the [USG] to support the development of the capacity and capability of foreign security forces and their supporting institutions."<sup>159</sup> JCISFA applied this definition broadly, with particular emphasis on ANSF institutional development. A key SFA lesson learned from the past decade of operations was that investments in partnered security forces were not sustainable without parallel development of supporting institutions; this required placing special importance on the development of Afghan security institutions, including the MOD and MOI,<sup>160</sup> in anticipation of the upcoming transition to the Resolute Support Mission (RSM).<sup>161</sup> JCISFA's analytical approach also assumed that SFA investments in security must support rule of law development to enable these transitions and promote long-term stability.<sup>162</sup>

The body of information compiled by JCISFA revealed that corruption had a corrosive effect on the development of the ANSF. ISAF advisor teams routinely observed indications of corrupt activities that, left unchecked, could degrade the effectiveness of the overall advisory effort and undermine the legitimacy of the ANSF.<sup>163</sup> These observations presented a practical dilemma for advisors who relied on rapport with their Afghan counterparts to carry out their

---

<sup>157</sup> The term ANSF is inclusive of Afghan security institutions (ASI), training institutions, and fielded security forces (e.g., Afghan National Army [ANA], Afghan National Police [ANP]).

<sup>158</sup> The summary of findings and recommendations is derived from a larger JCISFA study report, to be published separately by JCISFA at a later date.

<sup>159</sup> Joint Doctrine Note 1-13, "Security Force Assistance," 29 April 2013, page I-1.

<sup>160</sup> The National Directorate of Security (NDS) is also an Afghan security institution but was outside the scope of this analysis.

<sup>161</sup> Resolute Support Mission (RSM) is the NATO-led post-2014 mission to train, advise, and assist Afghan Security Forces.

<sup>162</sup> As defined in the 2011 "Rule of Law Handbook," rule of law is "a principle of governance in which all persons, institutions and entities, public and private, including the state itself, are accountable to laws that are publically promulgated, equally enforced, and independently adjudicated, and which are consistent with international human rights principles." "Rule of Law Handbook," The Judge Advocate General's Legal Center and School, US Army, Center for Law and Military Operations, 2011, page 3.

<sup>163</sup> The term "advisory effort" includes all SFA activities and core functions within ISAF having equities or interest in ANSF development and transition. This includes Afghan ministry-level advisors and their advisor teams; institutional trainers and advisors and their teams, and SFA Advisor Teams (SFAATs) aligned with fielded ANA and ANP units. The advisory effort includes major ISAF commands such as NATO Training Mission-Afghanistan (NTM-A)/Combined Security Transition Command-Afghanistan (CSTC-A), IJC, and other ISAF organizations.

missions. In addition, interviews revealed that addressing corruption was often not a priority in many Afghan organizations. Further, advisors reported difficulties in achieving CAC unity of effort horizontally and vertically across the advisory effort, creating gaps in the development of the ANSF. These gaps presented risks to the security environment and provided opportunities for corrupt actors to siphon resources for private gain.

## Findings

JCISFA determined the following study findings based on its analysis of interviews and other data:

- ANSF anti-corruption efforts depended upon the concurrent development of Afghan rule of law (e.g., laws, legal authorities, and policies).
- Numerous SFA contracting requirements (including those related to transition), as well as contributions to the ANSF via the Afghan Ministry of Finance (MOF), created an environment susceptible to fraud, waste, and abuse.
- Fragmented efforts and lack of assessment tools degraded advisors' anti-corruption activities.

Each of these findings is discussed in detail, below.

### *Rule of Law*

**ANSF anti-corruption efforts depended upon the concurrent development of Afghan rule of law (e.g., laws, legal authorities, and policies).** In order to influence the behavior of corrupt actors, the ANSF required an adequate legal framework sufficiently empowered by authorities and policies. As the JCOA study noted, rule of law capacity was an essential element within a combating corruption framework. The lack of an effective legal framework was a consequence of the manner in which corruption was defined,<sup>164</sup> the lack of understanding of CAC efforts (e.g., laws requiring full and open disclosure), and limitations of Afghan law that restricted some ANP law enforcement activities (e.g., targeted investigations) and emboldened rogue actions (e.g., bribery and selective prosecution).

While there were multiple CAC-related organizations and activities that attempted to reign in corrupt activities, the preponderance of JCISFA interviews indicated that GIRoA's lack of political will undermined their efforts. For example, within the AGO, legal advisors documented numerous instances of corruption (e.g., bribes tied to corruption cases). Presidential Decree 45 (PD 45) mandated additional oversight of the AGO to reign in corrupt activities, yet this mandate was not fully implemented. The resulting lack of judicial integrity undermined Afghan rule of law—the foundation for CAC efforts within the ANSF.

---

<sup>164</sup> See page 2 of this report for a discussion of the ways in which corruption was defined.

Afghan MOD and MOI anti-corruption policies were broadly written and lacked clear linkages to Afghan law and other legal authorities. This mismatch hindered development and implementation across the ANSF. As several senior legal advisors mentioned, it was not clear what should be considered corruption.<sup>165</sup>

Further, anti-corruption efforts were not fully understood within the ANSF, resulting in improper implementation and limited effectiveness, despite Afghan laws requiring full and open disclosure. This lack of understanding inhibited efforts to improve transparency, accountability, and oversight (TAO) within the ANSF—efforts that were essential to hardening Afghan institutions against corruption. Compounding this was the frequent inability of ANA and ANP key leaders to understand how even the perception of corruption affected their mission.

Gauging the ANSF and Afghan populace's perspectives on corruption required deliberate analysis; however, advisors aligned to the fielded ANSF often lacked the time and resources to assist their counterparts in conducting such deliberate assessments. Further, as noted in the JCOA report, assessing corruption via polls or other measures remained a difficult undertaking in Afghanistan.

Afghan law enforcement lacked the authority and capacity to target corrupt actors, conduct investigations, and prosecute to the fullest extent of the law.<sup>166</sup> This institutional weakness was acknowledged by PD 45 and the recommendations of the Independent Joint Anti-corruption Monitoring and Evaluation Committee (MEC) reports. Further, law enforcement and prosecutorial activities were not clearly bound by Afghan law, authorities, and policies, leading to instances of bribery, selective prosecution, and extortion.

More broadly, gaps in dispute resolution processes marginalized the ANP and hampered development of the justice sector. Widespread perceptions of ANP criminality and corruption degraded their influence and contrasted with Afghan views of the Taliban as relatively corruption-free.<sup>167</sup> Coupled with a lack of confidential reporting methods, these perceptions led Afghans in some regions to increasingly turn to the Taliban's "shadow" judicial systems, further detracting from broader ANSF efforts to establish security and promote governance.

### ***Contracting Environment***

**Numerous SFA contracting requirements (including those related to transition), as well as contributions to the ANSF via the Afghan MOF, created an environment susceptible to fraud, waste, and abuse.** JCOA found that investments in the Afghan government exceeded GIRoA's absorptive capacity; JCISFA's analysis focused on the downstream effects of these investments

---

<sup>165</sup> Senior Legal Advisors, ANA Corps and Afghan MOD, JCISFA interviews, 9 and 13 August 2013, respectively.

<sup>166</sup> Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC) "Report on the Implementation of Anti-Corruption Related Elements of Presidential Decree 45," 13 March 2013, pages 6 and 9.

<sup>167</sup> SIGAR "Quarterly Report to the US Congress," 30 January 2013, page 111; SIGAR "Quarterly Report to the US Congress," 30 April 2013, page 123; SIGAR "Quarterly Report to the US Congress," 30 July 2013, page 133.

on advisors and their ANSF counterparts. ISAF advisors served at the “tip of the spear” in overseeing the distribution of resources originating from the Afghan Security Forces Fund (ASFF). These resources were allocated by contracts administered by ISAF or ANSF representatives, with local Afghan vendors providing contracted goods and services. The fragile security environment and urgency of the ISAF mission did not support the management and oversight required to mitigate the abuse of donor nation resources.<sup>168</sup> The weakness of ANSF financial and logistics systems provided further opportunities for corrupt actors to siphon resources.

Gaps in current contract management processes exposed resources to fraud, waste, and abuse. As ISAF transitioned from a direct combat role to an SFA mission set, advisor teams increasingly inherited contract management and oversight requirements. The integrity of the contract management process was contingent upon the proper execution and integration of core functions, including the Contracting Officer Representative (COR) and Contracting Officer Technical Representative (COTR). JCISFA interviewed advisors who executed COR and COTR functions in addition to their roles as advisors. These advisors reported that a lack of unity of effort and common understanding in the management and oversight of contracts increased vulnerability to corrupt activities. The magnitude of the potential for fraud, waste, and abuse was most evident in the loss of accountability of fuel sourced through US contracts, many of which were in the process of transitioning to ANSF counterparts. This presented significant challenges to the advisory effort, particularly in organizations where the ANSF did not have processes in place to effectively manage contracts.

The gaps in ANSF contract management and oversight were compounded by weaknesses in the ANSF finance and logistics systems. JCISFA interviewed finance advisors working at Afghan security institutions who reported inadequate TAO mechanisms in place for ANSF finances, further evidenced by the low budget execution rates of relevant Afghan ministries.<sup>169</sup> This represented a significant vulnerability to US investments, as the ASFF was the principle means for funding ANSF development. JCISFA also interviewed key leaders who provided insights into how advisors supported the planning, programming, and budget execution of ASFF funding lines. Weaknesses in the ANSF finance system were a key concern as the US increased its levels of direct contribution to the Afghan MOF.

Afghan security force logistics systems, a key function of the ANSF, were susceptible to exploitation by corrupt actors. ISAF logistics advisors played an important role in developing an ANSF logistics system capable of sustaining operations without ISAF assistance—a core requirement during transition. Logistics advisors faced many daunting challenges, including illiteracy within the ANSF, lack of a national Afghan supply catalogue, and overall lack of supply accountability, increasing the exposure of assets to theft. Advisors struggled to impart the need to reconcile consumption data with supply forecasting and mission planning. These activities were critical in promoting TAO within the broader ANSF supply system.

<sup>168</sup> “Direct Assistance to the Afghan Government Faces Risks,” SIGAR Testimony, 13 February 2013, page 5.

<sup>169</sup> “Economics of Self-Sustainability: The Future of Afghanistan’s Economy,” Civil-Military Fusion Center, August 2013, page 1.

## ***Advisory Effort Challenges***

### **Fragmented efforts and lack of assessment tools degraded advisors' anti-corruption activities.**

A lack of unity of effort confused and frustrated advisors' ANSF counterparts and impacted their collective CAC efforts. Advisors also lacked the ability to measure corruption through observation and assessment, hampering efforts to prevent and deter corruption by resolving or mitigating gaps in ANSF systems.

There was no clearly-identified authority responsible for coordinating the interdependent role of the advisors, creating risks to broader efforts to contain corruption in the ANSF. There appeared to be a significant disconnect between the anti-corruption approach that existed at the national level and what was practiced at the local level. Afghan counterparts became confused and frustrated when offered differing and competing counsel from advisors operating at various echelons within ISAF. Some advisors referred to this dichotomy as the difference between those advisors who resided within the "Kabul bubble" and those who operated in the hinterlands.

The absence of coherent mechanisms for advisors to assess corruption complicated the effort. Legacy assessment tools that were focused on ANSF performance failed to provide the means to measure the more nuanced indicators of corrupt activities. Further, the tendency of advisors to compensate for weaknesses within the ANSF by performing tasks themselves (instead of advising their ANSF counterparts) compounded the assessment problem. This practice clouded the process of assessing the true capacity of the ANSF and concealed factors that might be limiting their success, such as corruption. For example, an inability of the ANSF to sustain an operation with sufficient bulk fuel might prompt US forces to compensate or enable the ANSF with additional fuel deliveries. Such an approach might have the unintended consequence of inflating the assessment of ANSF abilities to sustain an operation and hiding the root causes why sufficient fuel was not available for the operation. In this case, if a shortage resulted from ANSF theft and black market sale, the true impact of this corrupt activity might never come to light.

Many advisors came to describe corruption in Afghanistan in simple terms, stating, "You know it when you see it." Even without effective assessment tools, JCISFA illuminated the corrosive impact corruption had on ANSF development and underscored the need for commanders to be able to gauge the true impact of the problem and its effects on their campaigns.

## JCISFA Recommendations

The following recommendations address shortcomings revealed through the JCISFA study of corruption's impact on the ANSF and the SFA advisory effort:

- **Promote greater TAO within ANSF legal, financial, and logistics systems.** Advisors operated in key nodes within these ANSF systems; they learned that their ability to influence counterparts through the competent application of advising skills was central to hardening ANSF systems to resist corruption.
- **Link the development of the ANSF to Afghan rule of law, authorities, and policies.** Linking security development to rule of law is an SFA imperative. In this case, Afghan legal institutions were crucial for an effective ANSF anti-corruption framework. Likewise, the development and operation of ANSF financial and logistics systems must occur within the framework of Afghan law, authorities, and policies.
- **Operationalize the ASFF standard operating procedures (SOP) to support advisory effort awareness, understanding, and application.** Advisors must recognize the extent to which the ANSF depends on the ASFF. The ASFF SOP must be the primary toolkit of an advisor operating within Afghan financial or logistics systems.
- **Plan for increased dependence on transportation contracts during the later stages of transition.** As the ISAF footprint shrinks, many tasks executed by coalition logistics forces must be transitioned to Afghan contracts. Management and oversight of these contracts will be of central importance in preventing abuse.
- **Distribute and integrate contract management and oversight functions across the advisory effort.** As the mission in Afghanistan shifted to an SFA focus, many advisor teams unevenly shouldered the burdens of contract management. ISAF must be cognizant of these changing roles and the need for increased training and synchronization.
- **Develop a working knowledge of key nodes and stakeholders within the ANSF logistics system.** Efforts to improve TAO within the ANSF logistics system should be tied to reconciling consumption data with requirements forecasting and ASFF programming.
- **Speak with a single advisory voice; establish common and clearly understood ANSF developmental objectives and approaches.** Consistent messaging strengthens the ability of advisors to influence counterparts.
- **Leverage the advisory effort to maintain situational awareness across the Combined Joint Operating Area-Afghanistan and promote anti-corruption measures.** As the ISAF footprint shrinks, advisors are essential to maintaining a common operational picture.



- **Follow the money.** The ability of advisors to determine funding flows will help them focus on those areas where efforts to harden ANSF systems to resist corruption will offer the best return on investment.
- **Integrate influencing skills and best practices for promoting TAO into advisor training curricula.** The ability of advisors to shape and influence their counterparts is of critical importance. Corruption is likely to be a recurring theme in future advisory missions.

## Further Information

This appendix is a summary of a larger JCISFA report. Pending appropriate staff actions, that report will be available at <https://www.jcisfa.jcs.mil>.

**UNCLASSIFIED**

INTENTIONALLY BLANK

**UNCLASSIFIED**

## Appendix D: Abbreviations

ACTF	Anti-Corruption Task Force
AFPAK	Afghanistan-Pakistan
AGO	Attorney General's Office
ALP	Afghan Local Police
ANA	Afghan National Army
ANP	Afghan National Police
ANSF	Afghan National Security Forces
AQ	Al Qaeda
ASFF	Afghan Security Forces Fund
ASI	Afghan Security Institutions
ATFC	Afghan Threat Finance Cell
BPC	Building Partnership Capacity
C2	Command and Control
CA	Civil Affairs
CAC	Counter/Anti-Corruption
CALL	Center for Army Lessons Learned
CCIEG	Counter-Corruption Interagency Effects Group
CCMD	Combatant Command
CENTCOM	US Central Command
CERP	Commanders' Emergency Response Program
CIA	Central Intelligence Agency
CJIATF-A	Combined Joint Interagency Task Force – Afghanistan
COIN	Counterinsurgency
COMIJC	Commander, ISAF Joint Command
COMISAF	Commander, International Security Assistance Force
COP	Common Operational Picture
COR	Contracting Officer Representative
COTR	Contracting Officer Technical Representative
CPI	Corruption Perceptions Index
CPN	Criminal Patronage Network
CSTC-A	Combined Security Transition Command – Afghanistan
CT	Counterterrorism
DEA	Drug Enforcement Administration
DOD	Department of Defense
DOS	Department of State
DTO	Drug Trafficking Organization
FAO	Foreign Area Officer
FAR	Federal Acquisition Regulation

UNCLASSIFIED

FBI	Federal Bureau of Investigation
FRAGORD	Fragmentary Order
GAO	Government Accountability Office
GIRoA	Government of the Islamic Republic of Afghanistan
HHQ	Higher Headquarters
HNT	Host-Nation Trucking
HOOAC	High Office of Oversight and Anti-Corruption
HQ	Headquarters
IDC	Information Dominance Cell
IG	Inspector General
IG/TAO	Inspector General for Transparency, Accountability, and Oversight
IJC	ISAF Joint Command
IOCC	Interagency Operations Coordination Center
ISAF	International Security Assistance Force
IWA	Integrity Watch Afghanistan
JALLC	Joint Analysis and Lessons Learned Centre
JCISFA	Joint Center for International Security Force Assistance
JCOA	Joint and Coalition Operational Analysis
JECC	Joint Enabling Capabilities Command
JIACG	Joint Interagency Coordination Group
JP	Joint Publication
JPME	Joint Professional Military Education
JTF	Joint Task Force
LNO	Liaison Officer
MAG	Military Advisory Group
MEC	Monitoring and Evaluation Committee
MOD	Ministry of Defense
MOF	Ministry of Finance
MOI	Ministry of Interior
NATO	North Atlantic Treaty Organization
NATTF	NATO Afghanistan Transition Task Force
NCA	National Crime Agency
NDAA	National Defense Authorization Act
NDS	National Directorate of Security
NGO	Nongovernmental Organization
NTM-A	NATO Training Mission – Afghanistan

## UNCLASSIFIED

OEF	Operation ENDURING FREEDOM
OPLAN	Operation Plan
OPORD	Operation Order
PD	Presidential Decree
PEC	Presidential Executive Commission
PME	Professional Military Education
RC	Regional Command
RSM	Resolute Support Mission
SES	Senior Executive Service
SFA	Security Force Assistance
SFAAT	Security Force Assistance Advisor Team
SIGAR	Special Inspector General for Afghanistan Reconstruction
SOF	Special Operations Forces
SOP	Standard Operating Procedures
SPOD	Seaport of Debarkation
SVTC	Secure Video Teleconference
TAA	Train, Advise, and Assist
TACC	Transparency, Accountability, and Counter-Corruption
TAO	Transparency, Accountability, and Oversight
TI	Transparency International
TMAF	Tokyo Mutual Accountability Framework
UNAMA	UN Assistance Mission in Afghanistan
UNDP	UN Development Programme
UNODC	UN Office on Drugs and Crime
USAID	US Agency for International Development
USFOR-A	US Forces Afghanistan
USG	US Government